



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

March 13, 2013

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2012 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. We are submitting this report prior to March 15, 2013, as required in the Air Operating Permit 04-0004, condition 154.

The report consists of the following sections, as required by condition 154:


Annual Records of Production	Annual Records of Fuel Usage
Hours of Operation	Excess emissions upset log
Emission Fee Calculations	Green House Gas Emissions
Risk Management Plan Certification	Recovery Furnace Natural Gas Capacity Factor

The second semi-annual compliance certification covers the period July 1 through December 31, 2012.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

Encl.

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprting Req 80

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Received

MAR 19 2013

Office Of Air, Waste  
And Toxics

Received

MAR 19 2013

Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

January 27, 2012

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2011 4<sup>th</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2011 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455-3233.

Sincerely,

Shawn T. Wood  
Interim Mill Manager

Received  
FEB 01 2012  
Office Of Air, Waste  
And Toxics

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 26, 2013

Mr. George F. Davis  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2013 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT**  
(January 1, 2013 through June 30, 2013)

Dear Mr. Davis:

Please find enclosed two copies of the 2013 first semi-annual compliance certification report for the Georgia-Pacific Consumer Products LP Wauna Mill. We are submitting this report by July 30, 2013 as required in the Air Operating Permit 04-0004, condition 154.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Enclosure

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E – Rprtnq Req 70

Received  
AUG 12 2013  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

March 10, 2011

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2010 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. We are submitting this report prior to March 15, 2011, as required in the Air Operating Permit 04-0004, condition 154.

The report consists of the following sections, as required by condition 154:

Annual Records of Production

Hours of Operation

Emission Fee Calculations

Risk Management Plan Certification

Annual Records of Fuel Usage

Excess emissions upset log

Green House Gas Emissions

Recovery Furnace Natural Gas Capacity Factor

The second semi-annual compliance certification covers the period July 1 through December 31, 2010.

Please note, there were two permits for the calendar year 2010. The first permit covered the period July 1 to December 1, 2010, while the second permit covered the period December 2 to December 31, 2010.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

Encl.

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprtnq Req 80

Received  
MAR 16 2011  
Office Of Air, Waste  
And Toxics





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

May 15, 2012

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for April 2-4, 2012, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Al Deichsel'.

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450

Received  
MAY 22 2012  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
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(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 27, 2012

Received

AUG 9 1 2012  
Office Of Air, Waste  
And Toxics

Mr. George F. Davis  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2012 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT**  
**(January 1, 2012 through June 30, 2012)**

Dear Mr. Davis:

Please find enclosed two copies of the 2012 first semi-annual compliance certification report for the Georgia-Pacific Consumer Products LP Wauna Mill. We are submitting this report by July 30, 2012 as required in the Air Operating Permit 04-0004, condition 154.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Enclosure

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E – Rprtnq Req 70



Received  
MAR 14 2012  
Office Of Air Quality  
And Toxics  
Georgia-Pacific Consumer Products LP  
Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

March 13, 2012

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2011 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. We are submitting this report prior to March 15, 2012, as required in the Air Operating Permit 04-0004, condition 154.

The report consists of the following sections, as required by condition 154:


Annual Records of Production	Annual Records of Fuel Usage
Hours of Operation	Excess emissions upset log
Emission Fee Calculations	Green House Gas Emissions
Risk Management Plan Certification	Recovery Furnace Natural Gas Capacity Factor

The second semi-annual compliance certification covers the period July 1 through December 31, 2011.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

Encl.

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprtnq Req 80



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

June 24, 2010

Received

JUN 30 2011  
Office Of Air, Waste  
And Toxics

Mr. George F. Davis.  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2010 SECOND SEMI-ANNUAL COMPLIANCE CERTIFICATION  
REPORT – AMENDMENT (July 1 through December 31, 2010)**

Dear Mr. Davis:

Please find enclosed two copies of an amendment to the 2010 second semi-annual compliance certification report for the Georgia-Pacific Consumer Products LP, Wauna Mill. Based on an assessment of this report, we are revising our response for Condition 15 of the Title V Operating Permit #04-0004.

Please note, there were two permits for the calendar year 2010, so we are submitting a revised Part1, page 1 for each of the two permits. The first permit covered the period from July 1 to December 1, 2010, while the second permit covered the period from December 2 to December 31, 2010.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

Enclosure

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E – Rprtnq Req 70





**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

May 13, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Received**

**MAY 16 2011**

**Office Of Air, Waste  
And Toxics**

**RE: SUBPART MM 1st QUARTER 2011 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2011 First Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

RECEIVED

APR 28 2015

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

April 20, 2015

Office of Air, Waste & Toxics

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 1<sup>st</sup> QUARTER 2015 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP Wauna Mill's Subpart MM sources 2015 First Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Avenue  
Seattle, WA 98101

OR/Compl.



**Georgia-Pacific**

Received

AUG 04 2015

Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 22, 2015

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

**RE: FLUID BED BOILER 2015 2<sup>nd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2015 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Relative Test Accuracy Audit (RATA), which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Ave.  
Seattle, WA 98101

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OR/Compl.





July 22, 2015

Received

JUL 31 2015

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

Office of Air, Waste & Toxics

**Re: Cluster Rule Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached pursuant to Condition 7 of Part 2 of our Title V permit is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period of January 1 through June 30, 2015. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent of total operating time for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans. As of September 11, 2012, the federal Subpart S rule no longer requires SSM plans [40 CFR 63.6(e)(3)] or semiannual SSM reports [40 CFR 63.10(d)(5)], although excess emissions and continuous monitoring system performance reports (or Summary Reports) are still required [40 CFR 63.10(e)(3)]. This report includes a description of actions taken to minimize emissions and correct malfunctions as required by 40 CFR 455 (g).

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

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OR/Comal





Georgia-Pacific Consumer Products LP

July 22, 2015

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Received  
JUL 31 2015

Office of Air, Waste & Toxics

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

**Re: MACT II Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached pursuant to Condition 7 of Part 2 of our Title V permit is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the "MACT II" rule, 40 CFR Part 63, Subpart MM, for the time period of January 1 through June 30, 2015. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent of the total operating time for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent of the total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

OR/Compl.



Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 22, 2015

Mr. George F. Davis  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

**RE: 2015 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT**  
**(January 1, 2015 through June 30, 2015)**

Dear Mr. Davis:

Please find enclosed two copies of the 2015 first semi-annual compliance certification report for the Georgia-Pacific Consumer Products LP Wauna Mill. We are submitting this report by July 30, 2015 as required in the Air Operating Permit 04-0004, condition 154.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Enclosure

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

Received

JUL 31 2015

Office of Air, Waste & Toxics

File: E – Rprtnq Req 70

OR/Compl.



Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 22, 2015

Received

JUL 31 2015

Office of Air, Waste & Toxics

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

**RE: SUBPART MM 2<sup>nd</sup> QUARTER 2015 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP Wauna Mill's Subpart MM sources 2015 Second Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Avenue  
Seattle, WA 98101

OR/Comp.





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
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(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

**Certified Mail # 7011 2000 0000 5269 4393**

August 27, 2015

Received

SEP 3 - 2015

Director, Office of Air, Waste and Toxics  
Environmental Protection Agency - Region 10  
Mail Stop AWT-150  
1200 6<sup>th</sup> Avenue, Suite #900  
Seattle, WA 98101

Office of Air, Waste & Toxics

**RE: Initial Notification Report (INR) for National Emission Standards for Hazardous Air Pollutants (HAP) for Stationary Reciprocating Internal Combustion Engines (RICE) – 40 CFR Part 63 Subpart ZZZZ**

Dear Sir or Madam:

As required by 40 CFR §63.9(b) and §63.6645(f), Georgia-Pacific Consumer Products LP Wauna Mill submits this Initial Notification Report (INR) of Maximum Achievable Control Technology (MACT) applicability. Georgia-Pacific reserves the right to withdraw, modify, or supplement this notice in the future, if it determines that the referenced MACT standard does not apply to the mill as currently believed or that different or additional information should be submitted.

This INR is specifically for a new, stationary reciprocating internal combustion engine (RICE) that operates to drive an electrical generator for emergency situations at the Wauna Mill, which is a major source of HAP emissions. The attached INR form provides additional information about this stationary RICE as required by 40 CFR 63.6645(f) and §63.9(b)(2)(i) through (v). This stationary RICE has no additional requirements under 40 CFR Part 63 – Subpart ZZZZ because it operates exclusively as an emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.

I certify under the penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained or referenced in this initial notification report are true, accurate, and complete. If there are any questions concerning this Initial Notification Report, please contact Mike Crawford, on my staff, at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President and Mill Manager

Attachment: Initial Notification

c: Mr. George Davis  
Oregon Dept. of Environmental Quality  
Air Quality Division  
Northwest Region  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100  
Certified Mail # **7015 0640 0006 8763 0388**

OR/Compl./4x2





Georgia-Pacific Consumer Products LP

↗  
Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

August 28, 2015

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for July 21-23, 2015, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3271.

Sincerely,

Brittany Park  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450

Received  
SEP 08 2015  
Office of Air, Waste & Toxics

  
OR/Compl.



Received

OCT 16 2015

Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

October 9, 2015

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

**RE: SUBPART MM 3<sup>rd</sup> QUARTER 2015 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP Wauna Mill's Subpart MM sources 2015 Third Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

*Jeremy Hess (For Steve Francoeur)*

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Avenue  
Seattle, WA 98101

OR/Compl.



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

October 29, 2015

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

**RE: FLUID BED BOILER 2015 3<sup>rd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2015 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit (CGA), which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Ave.  
Seattle, WA 98101

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Office of Air, Waste & Toxics  
NOV 02 2015  
Received

OR/Compl.



ALS Environmental  
ALS Group USA, Corp  
1317 South 13th Avenue  
Kelso, WA 98626  
T : +1 360 577 7222  
F : +1 360 636 1068  
[www.alsglobal.com](http://www.alsglobal.com)

April 27, 2015

**Analytical Report for Service Request No: K1503773**

Brittany Park  
Georgia-Pacific Consumer Products LP  
92326 Taylorville Road  
Clatskanie, OR 97016

**RE: Wauna 4Q FC**

Dear Brittany,

Enclosed are the results of the sample(s) submitted to our laboratory April 13, 2015  
For your reference, these analyses have been assigned our service request number **K1503773**.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at [www.alsglobal.com](http://www.alsglobal.com). All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3375. You may also contact me via email at [Janet.Malloch@alsglobal.com](mailto:Janet.Malloch@alsglobal.com).

Respectfully submitted,

**ALS Group USA, Corp. dba ALS Environmental**

Janet Malloch  
Project Manager





Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

October 8, 2015

USPS Certified Mail # 7015 0640 0006 8765 1192

Mr. George Davis  
DEQ - NWR  
700 NE Multnomah St, Suite 600  
Portland, OR 97232-4100

Received

OCT 13 2015

Office of Air, Waste & Toxics

**RE: Initial Compliance Testing and Performance Evaluation Notification for the Fluidized Bed Boiler (40 CFR 63 Subpart DDDDD)**

Dear Mr. Davis:

Georgia-Pacific Consumer Products, LP owns and operates a Kraft pulp and paper mill in Clatskanie, Clatsop County, Oregon (Wauna Mill), which is a major air emissions source under the Title V Major Source Operating Permit program. The Wauna Mill operates under Air Operating Permit No. 04-0004 issued by the State of Oregon Department of Environmental Quality (ODEQ).

Pursuant to the requirements at 40 CFR 63.7510, the Wauna Mill plans to conduct initial compliance testing and performance evaluations of its Fluidized Bed Boiler and associated monitoring parameters from December 8 - December 11, 2015. This testing is to demonstrate compliance with the applicable emission limits in Table 2 to Subpart DDDDD of Part 63. The Fluidized Bed Boiler at the Wauna Mill falls in boiler subcategory 9, "Fluidized bed units designed to burn biomass/bio-based solid", as defined in 40 CFR 63.7575.

Testing will be conducted for filterable particulate matter (FPM), Mercury (Hg), and Hydrogen Chloride (HCl). The Wauna Mill has elected to comply with the alternate CO Continuous Emission Monitoring System (CEMS) based limit by installing, certifying, operating, and maintaining a CO CEMS according to the applicable procedures under Performance Specification 4 at 40 CFR Part 60, Appendix B. The initial performance evaluation of the CO CEMS will be conducted at a later date, under a separate notification.

Additionally, the Wauna Mill currently operates and maintains a Continuous Opacity Monitoring System (COMS) according to Performance Specification 1 at 40 CFR Part 60, Appendix B. A performance evaluation of the COMS will be conducted during the scheduled testing, and COMS results will be used to determine compliance with the opacity limit in Table 4 to Subpart DDDDD.

OR/Compl

This letter is intended to satisfy the 60-day notification requirement for performance testing and performance evaluation specified in 40 CFR 63.7545(d), 40 CFR 63.7(b), 63.8(e)(2), 63.9(e), and 63.9(g). The Avogadro Group, LLC will be the testing company and has prepared the attached site-specific source test plan summary. The full site-specific test plan and performance evaluation plan for the CMS and COMS components used for the Fluidized Bed Boiler will be available upon request.

If you have any questions regarding this notification, please contact Gary Pettit at 503-455-3353 or [gary.pettit@gapac.com](mailto:gary.pettit@gapac.com). I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,



Steve R. Francoeur  
Vice President / Mill Manager

cc:

Katie Owens - U.S. EPA/Seattle  
Kevin Donahoe - Avogadro Group, LLC



Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

February 8, 2016

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

**RE: SUBPART MM 4<sup>th</sup> QUARTER 2015 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP Wauna Mill's Subpart MM sources 2015 Fourth Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Avenue  
Seattle, WA 98101

Received

FEB 16 2016

Office of Air, Waste & Toxics

OR/Compl.





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FEB 8 2016

Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

February 3, 2016

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

**Re: Notification of Compliance Status (NOCS) Report  
Georgia-Pacific Consumer Products LP – Wauna Mill  
40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants:  
Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT)**

Dear Mr. Davis:

Please find attached Georgia-Pacific Consumer Products LP – Wauna Mill's Notification of Compliance Status Report that is being submitted to fulfill the requirements found in 40 CFR §63.9(h) and §63.7545(e). In addition, copies of the performance test results, fuel analysis results, and CMS performance evaluation test results are provided in Attachments A and B, respectively. Performance test results, fuel analysis and performance evaluation of CMS measuring audit parameters were submitted to EPA via CEDRI per 63.7550(h).

If you have any questions regarding this notification, please feel free to contact Mike Crawford on my staff at (503) 455-3233 or via e-mail at [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Enclosures: NOCS Form  
Attachment A – Performance Test Results & Fuel Analysis  
Attachment B – CMS Performance Evaluations

c: Ms. Katie Owens  
US EPA – Region 10  
Mail Stop AWT-150  
1200 6<sup>th</sup> Avenue, Suite #900  
Seattle, WA 98101

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OR/Compl.





Georgia-Pacific Consumer Products LP

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Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Office of Air, Waste & Toxic

January 26, 2016

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
700 NE Multnomah St., Suite #600  
Portland, OR 97232-4100

**RE: FLUID BED BOILER 2015 4<sup>th</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2015 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit (CGA), which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

*Steve R. Francoeur (for S. Francoeur)*

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Ave.  
Seattle, WA 98101

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OR/Compl.



Georgia-Pacific Consumer Products LP



Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

February 27, 2015

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for January 26-28, 2015, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3271.

Sincerely,

Brittany Park  
Environmental Engineer

Received

MAR 03 2015

Office of Air, Waste & Toxics

cc. US EPA, Air Operating Permits  
File - PCR-BT 450

OR/Compl.



Received

DEC 8 - 2014

Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

December 4, 2014

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for October 20-22, 2014, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3271.

Sincerely,

Brittany Park  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450

OR/Como.



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

October 16, 2014

Received

**OCT 30 2014**

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Office of Air, Waste & Toxics

**RE: SUBPART MM 3<sup>rd</sup> QUARTER 2014 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP Wauna Mill's Subpart MM sources 2014 Third Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

✓ ☒ Compliance  
☐ TV Application  
☐ TV Activity  
☐ Other OR



Received



MAR 18 2014

Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

March 13, 2014

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

RE: 2013 ANNUAL AIR MONITORING REPORT

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. The second semi-annual compliance certification covers the period July 1 through December 31, 2013. We are submitting this report prior to March 15, 2014, as required in the Air Operating Permit 04-0004, condition 154.

The report consists of the following sections, as required by condition 154:

Annual Records of Production	Annual Records of Fuel Usage
Hours of Operation	Excess emissions upset log
Emission Fee Calculations	Green House Gas Emissions
Risk Management Plan Certification	Recovery Furnace Natural Gas Capacity Factor

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Encl.

c: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprtnq Req 80

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File: ☒ Compliance  
☐ Application  
☐ Policy  
☐ Other  
OR  
G.P. - Wauna Mill



RECEIVED

Georgia-Pacific Consumer Products LP

January 30, 2015

FEB 13 2015

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Mr. George F. Davis  
Office of Air, Waste & Toxics  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Re: Cluster Rule Excess Emissions and Continuous Monitoring Summary Report

Dear Mr. Davis:

Attached pursuant to Condition 7 of Part 2 of our Title V permit is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for the Cluster Rule, 40 CFR Part 63, Subpart S, for the time period of July 1 through December 31, 2014. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent of total operating time for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans. As of September 11, 2012, the federal Subpart S rule no longer requires SSM plans [40 CFR 63.6(e)(3)] or semiannual SSM reports [40 CFR 63.10(d)(5)], although we continue to use the SSM plan in part as a guide to ensure that affected emission units, controls, and monitoring equipment are operated consistent with safety and good air pollution control practices for minimizing emission. Excess emissions and continuous monitoring system performance reports (or Summary Reports) are still required [40 CFR 63.10(e)(3)].

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

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OR/Compl.



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FEB 18 2015

Georgia-Pacific Consumer Products LP

January 30, 2015

Office of Air, Waste & Toxics

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached pursuant to Condition 7 of Part 2 of our Title V permit is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the "MACT II" rule, 40 CFR Part 63, Subpart MM, for the time period of July 1 through December 31, 2014. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent of the total operating time for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent of the total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

OR/Compl.





**Georgia-Pacific**

RECEIVED

APR 28 2015

Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

April 20, 2015

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2015 1<sup>st</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2015 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtg Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Ave.  
Seattle, WA 98101

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OR/ Compl.





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

March 13, 2015

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2014 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. The second semi-annual compliance certification covers the period July 1 through December 31, 2014. We are submitting this report prior to March 15, 2015, as required in the Air Operating Permit 04-0004, condition 154.

The report consists of the following sections, as required by condition 154:

Annual Records of Production	Annual Records of Fuel Usage
Hours of Operation	Excess emissions upset log
Emission Fee Calculations	Green House Gas Emissions
Risk Management Plan Certification	Recovery Furnace Natural Gas Capacity Factor

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Encl.

c: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprtnq Req 80

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Received  
MAR 16 2015  
Office of Air, Waste & Toxics

OR/Compl.



Georgia-Pacific Consumer Products LP

→  
Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

January 7, 2015

Received

JAN 14 2015

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Office of Air, Waste & Toxics

**RE: SUBPART MM 4<sup>th</sup> QUARTER 2014 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP Wauna Mill's Subpart MM sources 2014 Fourth Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

OR/Compl.



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Received

JAN 14 2015

January 7, 2015

Office of Air, Waste & Toxics

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2014 4<sup>th</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2014 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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OR / camel



Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

August 7, 2014

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received

AUG 20 2014

Office of Air, Waste & Toxics

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for July 9-11, 2014, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3271.

Sincerely,

Brittany Park  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450

File:  
☒ Env/compliance  
☐ TV Application  
☐ TV Activity  
☐ Other  
**OR**





ALS Environmental  
ALS Group USA, Corp.  
1317 South 13<sup>th</sup> Avenue  
Kelso, WA 98626  
T: +1 360 577 7222  
F: +1 360 636 1068  
[www.alsglobal.com](http://www.alsglobal.com)

August 1, 2014

Analytical Report for Service Request No: K1407113

Brittany Park  
Georgia-Pacific Consumer Products LP  
92326 Taylorville Road  
Clatskanie, OR 97016

RE: Wauna 2Q FC

Dear Brittany:

*Attachment to  
Letter of 8/7/14  
from B. Park /  
Georgia Pacific  
w/ Rpt. (rec'd. 8/22/14)*

Received

AUG 20 2014

Office of Air, Waste & Toxics

Enclosed are the results of the samples submitted to our laboratory on July 14, 2014. For your reference, these analyses have been assigned our service request number K1407113.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at [www.alsglobal.com](http://www.alsglobal.com). All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please call if you have any questions. My extension is 3375. You may also contact me via Email at [Janet.Malloch@alsglobal.com](mailto:Janet.Malloch@alsglobal.com).

Respectfully submitted,

ALS Group USA Corp. dba ALS Environmental

*Janet Malloch*

Janet Malloch  
Project Manager

JM/aj

Page 1 of 24



Georgia-Pacific Consumer Products LP

→  
Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

October 16, 2014

Received

OCT 30 2014

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Office of Air, Waste & Toxics

**RE: FLUID BED BOILER 2014 3<sup>rd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2014 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.


Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

I:\mike\air\titlev\fbblfb-3qtr-14.docx

File:  
☒ Eff/compliance  
☐ TV Application  
☐ TV Activity  
☐ Other  




Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

April 14, 2014

Received

APR 18 2014

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Office of Air, Waste & Toxics

**RE: SUBPART MM 1<sup>st</sup> QUARTER 2014 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2014 First Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

☒ Compliance  
☐ Application  
☐ Activity  
☐ Other

OR

G.P. / Wauna Mill



Received

MAY 2 - 2014

Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

April 29, 2014

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for April 2-4, 2014, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3271.

Sincerely,

Brittany Park  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450

File:  
☒ Env/compliance  
☐ TV Application  
☐ TV Activity  
☐ Other  
OR  
Wauna Mill





**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Received

**APR 18 2014**

April 14, 2014

Office of Air, Waste & Toxics

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2014 1<sup>st</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2014 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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File:  
☒ Env/Compliance  
☐ TV Application  
☐ TV Activity  
☐ Other

*OR*  
*G.P./Wauna Mill*



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

January 28, 2013

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2012 4<sup>th</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2012 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Relative Accuracy Test Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

I:\mikielair\titlev\fbbl\fb-4qtr-12.docx

Received  
JAN 31 2013  
Office Of Air, Waste  
And Toxics



**Georgia-Pacific**

File: ☒ Env/Compliance  
☐ TV Application  
☐ TV Activity  
☐ Other

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Received

OCT 29 2013

Office Of Air, Waste  
And Toxics

October 10, 2013

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2013 3<sup>rd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2013 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

I:\mike\air\titlev\fb\fb-3qtr-13.docx



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

October 14, 2013

Received

OCT 31 2013

Office Of Air, Waste  
And Toxics

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 3<sup>rd</sup> QUARTER 2013 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2013 Third Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File ✓  
Enf/Com  
TV Appl  
TV Activity  
Other  
OR





Georgia-Pacific

Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Received

FEB 04 2014

January 28, 2014

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Office of Air, Waste & Toxics

**RE: FLUID BED BOILER 2013 4<sup>th</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2013 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

*Steve R. Francoeur*

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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File:



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\_\_\_\_\_

\_\_\_\_\_

OR



Georgia-Pacific Consumer Products LP

January 28, 2014

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Received

FEB 04 2014

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Office of Air, Waste & Toxics

**Re: Cluster Rule Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period of July 1 through December 31, 2013. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:


1. The total duration of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent of total operating time for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 455 - 3233.

Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

I:\mike\air\ssm\ssm-excess-emissions-monitoring-summary-letter-2nd-semi-13.doc

File:  
✓  
OR



Georgia-Pacific Consumer Products LP

→  
Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

January 28, 2014

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received

FEB 04 2014

Office of Air, Waste & Toxics

**Re: MACT II Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period of July 1 through December 31, 2013. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent of the total operating time for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent of the total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

✓  
OR





Georgia-Pacific Consumer Products LP

→  
Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

January 28, 2014

Received

FEB 04 2014

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Office of Air, Waste & Toxics

**RE: SUBPART MM 4<sup>th</sup> QUARTER 2013 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2013 Fourth Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

✓  
OR



Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

Received

MAR 11 2014

March 5, 2014

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Office of Air, Waste &amp; Toxics

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for January 15-17, 2014, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3271.

Sincerely,

nn

Brittany Park  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450

File: ✓ 100-100000-100000  
100-100000-100000  
100-100000-100000  
100-100000-100000  
100-100000-100000

OR  
G.P. - Wauna Mill

Received

AUG 1 - 2014



Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 25, 2014

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

RE: SUBPART MM 2<sup>nd</sup> QUARTER 2014 REPORT

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP Wauna Mill's Subpart MM sources 2014 Second Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File:  
✓ Info/Compliance  
OR

Received

AUG 1 - 2014



Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

July 25, 2014

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached pursuant to Condition 7 of Part 2 of our Title V permit is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period of January 1 through June 30, 2014. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent of total operating time for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans. As of September 11, 2012, the federal Subpart S rule no longer requires SSM plans [40 CFR 63.6(e)(3)] or semiannual SSM reports [40 CFR 63.10(d)(5)], although excess emissions and continuous monitoring system performance reports (or Summary Reports) are still required [40 CFR 63.10(e)(3)].

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 455 - 3233.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Steve R. Francoeur'.

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

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✓ compliance  
signature  
OR

Received

AUG 1 - 2014



Georgia-Pacific

Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 25, 2014

Mr. George F. Davis  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2014 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT**  
(January 1, 2014 through June 30, 2014)

Dear Mr. Davis:

Please find enclosed two copies of the 2014 first semi-annual compliance certification report for the Georgia-Pacific Consumer Products LP Wauna Mill. We are submitting this report by July 30, 2014 as required in the Air Operating Permit 04-0004, condition 154.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Enclosure

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E – Rprting Req 70

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File:            /compliance  
✓  
OR



Received

AUG 1 - 2014



Office of Air, Waste & Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 25, 2014

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached pursuant to Condition 7 of Part 2 of our Title V permit is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period of January 1 through June 30, 2014. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent of the total operating time for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent of the total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

A handwritten signature in cursive script that reads 'Steve R. Francoeur'.

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File:  
✓  
OR



Georgia-Pacific Consumer Products LP

→ Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Received

AUG 1 - 2014

Office of Air, Waste & Toxics

July 25, 2014

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2014 2<sup>nd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2014 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Relative Accuracy Test Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtg Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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File:  
✓ [ ] /copy [ ]  
[ ] TV Application  
[ ] TV Activity  
[ ] Other  
OR



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

August 7, 2014

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received

AUG 20 2014

Office of Air, Waste & Toxics

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for July 9-11, 2014, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3271.

Sincerely,

Brittany Park  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450

File:  
☒ Eff/Compliance  
☐ TV Application  
☐ TV Activity  
☐ Other  
**OR**



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

Received

MAY 17 2012

Office Of Air, Waste  
And Toxics

May 14, 2012

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 1st QUARTER 2012 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2012 First Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

A handwritten signature in cursive script that reads 'Steve R. Francoeur'.

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101





Received  
NOV 02 2012  
Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

October 22, 2012

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2012 3<sup>rd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2012 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Relative Accuracy Test Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

April 24, 2012

Received

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

MAY 01 2012  
Office Of Air, Waste  
And Toxics

**RE: FLUID BED BOILER 2012 1<sup>st</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2012 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

Received

JAN 25 2012  
Office Of Air, Waste  
And Toxics

**CERTIFIED MAIL No. 7011 2000 0000 5269 1736**  
**RETURN RECEIPT REQUESTED**

January 19, 2012

United States Environmental Protection Agency – Region X  
Air, Pesticides, & Toxics Management Branch  
Air Enforcement Section  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**RE:** Initial Notification Report (INR) for National Emission Standards for Hazardous Air  
Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters - 40  
CFR Part 63 Subpart DDDDD  
Title V Operating Permit No: 04-0004

Dear Sir/Madam:

As required by 40 CFR Sections 63.9(b) and 63.7545 and in light of the January 9, 2012 decision by the U.S. District Court for the District of Columbia vacating EPA's May 18, 2011 "Delay Notice" which had stayed the final March 21, 2011 Boiler MACT and Non-Hazardous Secondary Materials regulations pending reconsideration, enclosed is, Georgia-Pacific Consumer Products LP's Wauna Mill, located in Clatskanie, Oregon (the "Facility's") Initial Notification Report (INR) of Maximum Achievable Control Technology (MACT) applicability. This notice covers the Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP at 40 CFR Part 63 Subpart DDDDD, 76 Fed. Reg. 15608 (March 21, 2011). Note that, given continuing uncertainty with respect to whether combustion of certain secondary materials makes a particular unit subject to EPA's CISWI (commercial and solid waste incinerator) rules instead of the Boiler MACT rules, it is possible that one or more units identified in this notice may become subject to the CISWI rules. We reserve the right to amend or withdraw this notice in whole or in part based upon further analysis and EPA clarification.

If there are any questions on this updated Initial Notification Report, please contact Mike Crawford, Environmental Engineer at (503) 455-3233.

Sincerely,



Frank J. Walsh  
Interim Mill Manager

Attachment: Initial Notification Report (INR)

c: Scott K. Bailey, Director Environmental Compliance

Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Division  
2020 SW 4<sup>th</sup>, Suite 400  
Portland, OR 97201-5884  
Attn: George Davis  
**CERTIFIED MAIL No. 7011 2000 000 5269 0111**





**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

October 24, 2011

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received

OCT 31 2011  
Office Of Air, Waste  
And Toxics

**RE: FLUID BED BOILER 2011 3<sup>rd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2011 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

Frank J. Walsh  
Interim Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



Georgia-Pacific Consumer Products LP

Received

AUG 1 2012

Office Of Air, Waste  
And Toxics

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 27, 2012

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period of January 1 through June 30, 2012. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent of the total operating time for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent of the total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



Received  
JUG 01: 2  
Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 27, 2012

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 2nd QUARTER 2012 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2012 Second Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



Received

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 27, 2012

AUG 1 2012  
Office Of Air, Waste  
And Toxics

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period of January 1 through June 30, 2012. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent of total operating time for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

January 28, 2013

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for January 2-4, 2013, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Al Deichsel'.

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450

Received  
FEB 27 2013  
Office Of Air, Waste  
And Toxics



Received

NOV 05 2012  
Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

October 24, 2012

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 3<sup>rd</sup> QUARTER 2012 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2012 Third Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



**Georgia-Pacific**

*Georgia-Pacific Consumer Products LP*

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

April 22, 2011

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2011 1<sup>st</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2011 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

 **Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

April 18, 2013

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received  
MAY 01 2013  
Office Of Air, Waste  
And Toxics

**RE: FLUID BED BOILER 2013 1<sup>st</sup> QUARTER AIR REPORT**

Dear Mr. Davis:


Enclosed with this letter is the 2013 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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July 28, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

**RE: SUBPART MM 1st QUARTER 2011 REPORT- CORRECTION**

Dear Mr. Davis:

Attached to this letter is a correction to the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2011 First Quarter report previously submitted on May 13<sup>th</sup>, 2011.

The Excess Emissions / Parameter Monitor Exceedances Report for the West Chemical Recovery Furnace Electrostatic Precipitator reported 48 minutes of opacity >35% for February 20<sup>th</sup>, 2011. During records review for the preparation of the semi-annual report it was determined that this number was incorrect. As part of the corrective actions taken by the furnace operator during the event the damper was closed on the West Precipitator to eliminate air flow. This occurred 30 minutes into the event. During the 18 minutes following the damper closure there was no air flow out of the stack and the associated opacity should not have been reported. The corrected first quarter report pages are attached to this letter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

A handwritten signature in cursive script that reads 'Michael D. Tompkins'.

Michael D. Tompkins  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received  
AUG 03 2011  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 28, 2011

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 2nd QUARTER 2011 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2010 Second Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

A handwritten signature in black ink that reads 'Michael D. Tompkins'.

Michael D. Tompkins  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

December 5, 2011

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received

JAN 03 2012  
Office Of Air, Waste  
And Toxics

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for October 24-26, 2011, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

A handwritten signature in black ink, appearing to read 'Al Deichsel'.

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 2, 2013

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2013 2<sup>nd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2013 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Relative Accuracy Test Audit, which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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Received  
JUL 09 2013  
Office Of Air, Waste  
And Toxics





Georgia-Pacific Consumer Products LP

→  
Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Received

DEC 23 2013

Office Of Air, Waste  
And Toxics

December 16, 2013

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for November 11 – 13, 2013, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3271.

Sincerely,

Brittany Park  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450

File ☒ ☐ ☐ ☐  
Enf/compliance  
TV Application  
TV Activity  
Other  
OR



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

June 4, 2013

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for April 29 – May 1, 2013, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3271.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Brittany Park'.

Brittany Park  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450

Received  
JUN 17 2013  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

May 8, 2013

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received

MAY 17 2013  
Office Of Air, Waste  
And Toxics

**RE: SUBPART MM 1<sup>st</sup> QUARTER 2013 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2013 First Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

March 13, 2013

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period of July 1 through December 31, 2012. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:


1. The total duration of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent of total operating time for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

I:\mike\air\ssm\ssm-excess-emissions-monitoring-summary-letter-2nd-semi-12.doc

Received  
MAR 19 2013  
Office Of Air, Waste  
And Toxics





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

March 13, 2013

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 4<sup>th</sup> QUARTER 2012 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2012 Fourth Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Steve R. Francoeur'.

Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received  
MAR 19 2013  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
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(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

March 13, 2013

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period of July 1 through December 31, 2012. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent of the total operating time for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent of the total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

A handwritten signature in cursive script that reads 'Steve R. Francoeur'.  
Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received  
MAR 19 2013  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

November 26, 2012

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for October 22-24, 2012, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Al Deichsel'.

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450

**Received**  
DEC 11 2012  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

February 15, 2012

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received  
FEB 21 2012  
Office Of Air, Waste  
And Toxics

**RE: SUBPART MM 4th QUARTER 2011 REPORT**

Dear Mr. Davis:

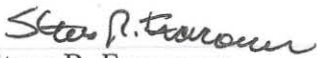
Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2011 Fourth Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 10, 2011

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; July 1 through December 31, 2010. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

A handwritten signature in black ink that reads 'Michael D. Tompkins'.

Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received

MAR 16 2011  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

March 10, 2011

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; July 1 through December 31, 2010. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

Received  
MAR 16 2011  
Office Of Air, Waste  
And Toxics



**Georgia-Pacific**

*Georgia-Pacific Consumer Products LP*

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 10, 2011

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 4th QUARTER 2010 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2010 Fourth Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

March 10, 2011

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: CORECTION TO SUBPART MM 3rd QUARTER 2010 REPORT**

Dear Mr. Davis:

During the compilation of the 2010 2<sup>nd</sup> Half MACT II Semi-Annual report a reporting error was discovered in the 3<sup>rd</sup> Quarter 2010 Lime Kiln Venturi Scrubber report. An excess emission was reported for the scrubber on July 4<sup>th</sup>, 2010 due to low scrubber differential pressure. The duration of the excess emission was reported as 12 hours. The correct duration for this event was 15 hours. This correction does not impact the mill's compliance with the applicable standards. The revised third quarter report for the Lime Kiln is attached for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

A handwritten signature in cursive script that reads 'Michael D. Tompkins'.

Michael D. Tompkins  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received  
MAR 16 2011  
Office Of Air, Waste  
And Toxics





**Georgia-Pacific**

*Georgia-Pacific Consumer Products LP*

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

January 24, 2011

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for January 3-5, 2011, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450

**Received**  
**JAN 31 2011**  
**Office Of Air, Waste**  
**And Toxics**



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

January 13, 2010

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2009 4<sup>th</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2009 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455-3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

April 29, 2010

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received  
MAY - 4 2010  
Office Of Air, Waste  
And Toxics

**RE: FLUID BED BOILER 2010 1<sup>st</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2010 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

*Frank Walsh*

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

January 13, 2011

Received

FEB 01 2011

Office Of Air, Waste  
And Toxics

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2010 4<sup>th</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2010 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455-3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101





Received

MAR 08 2010  
Office Of Air, Waste  
And Toxics

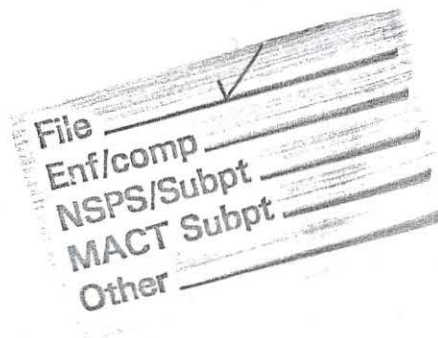
Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 3, 2010

**CERTIFIED MAIL: 7007 0710 0000 2160 7235**

Uri Papish  
Air Quality Program  
Oregon Department of Environmental Quality  
811 SW Sixth Avenue  
Portland, OR 97204



**Re: Georgia-Pacific Consumer Products LP Wauna Mill  
Boiler MACT 112(j) Part 2 Request for Additional Extension**

Dear Mr. Papish:

As you know, the U.S. Court of Appeals for the D.C. Circuit vacated and remanded the federal Boiler MACT rule (40 CFR Part 63, Subpart DDDDD) in its entirety in a June 8, 2007 decision (made effective in the Court's July 30, 2007 mandate). U.S. Environmental Protection Agency (EPA) is working to re-promulgate the rule, which requires it first to properly categorize and distinguish boilers and process heaters under Clean Air Act (CAA) section 112 from solid waste incinerators under CAA section 129.

Under cover of a letter dated August 24, 2009 to the Oregon Department of Environmental Quality (ODEQ), GP's Wauna Mill requested an extension to submit a Clean Air Act section 112(j) "MACT Hammer" Part 2 Application. In a letter dated August 28, 2009, ODEQ granted an extension until March 15, 2010.

In a letter dated March 1, 2010, ODEQ provided an update on the Part 2 "MACT Hammer" application process. According to ODEQ's letter, the United States Environmental Protection Agency (EPA) recently informed ODEQ that it was in the process of revising the rules governing the Clean Air Act section 112(j) ("MACT Hammer"). The new rules will reportedly clarify which requirements apply when a rule has been vacated, and establish new application procedures. In addition, ODEQ has been informed that EPA is on schedule to propose a new Boiler MACT rule this April and finalize it in time to meet a December 2010 court ordered deadline.



Received

MAR 12 2010

Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 10, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Enf Source ☒  
NSPS 60/62 §  
NESHAP §  
MACT §  
Other

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; July 1 through December 31, 2009. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

*Michael D. Tompkins*

Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

Received

MAY 17 2010

Office Of Air, Waste  
And Toxics

May 13, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 1st QUARTER 2010 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2010 First Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

Received  
MAY - 7 2010  
Office Of Air, Waste  
And Toxics

April 27, 2010

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for April 5-7, 2010, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Al Deichsel'.

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450





**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

October 5, 2009

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**Received**

**OCT 20 2009**

**Office Of Air, Waste  
And Toxics**

**RE: FLUID BED BOILER 2009 3<sup>rd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2009 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455-3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



File \_\_\_\_\_  
Enf/comp ☒ \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 28, 2010

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received  
AUG - 2 2010  
Office Of Air, Waste  
And Toxics

**RE: FLUID BED BOILER 2010 2<sup>nd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2010 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Relative Accuracy Test Audit (RATA) is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

*Michael D. Tompkins*

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



**Georgia-Pacific**

Received

NOV 02 2010

Georgia-Pacific Consumer Products LP

Office Of Air, Waste  
And Toxics

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

October 27, 2010

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

File	_____
Enf/comp	_____✓_____
NSPS/Subpt	_____
MACT Subpt	_____
Other	_____

**RE: FLUID BED BOILER 2010 3<sup>rd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2010 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Cylinder Gas Audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

Received

JUL 31 2009

Office Of Air, Waste  
And Toxics

July 29, 2009

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2009 2<sup>nd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2009 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 152 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The Relative Accuracy Test Audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101





**Georgia-Pacific**

Received

AUG 28 2009

Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

August 24, 2009

**CERTIFIED MAIL: 7008 1830 0004 3404 5708**

Gerald Ebersole  
Oregon Department of Environmental Quality  
811 SW Sixth Avenue  
Portland, OR 97204

**Re: Georgia-Pacific Consumer Products LP Wauna Mill  
Boiler MACT 112(j) Part 2 Request for Further Extension**

Dear Mr. Ebersole:

As you know, the U.S. Court of Appeals for the D.C. Circuit vacated and remanded the federal Boiler MACT rule (40 CFR Part 63, Subpart DDDDD) in its entirety in a June 8, 2007 decision (made effective in the Court's July 30, 2007 mandate). U.S. Environmental Protection Agency (EPA) is working to re-promulgate the rule, which requires it first to properly categorize and distinguish boilers and process heaters under Clean Air Act (CAA) section 112 from solid waste incinerators under CAA section 129.

Under cover of a letter dated January 23, 2009 to the Oregon Department of Environmental Quality (ODEQ), GP's Wauna Mill requested a six-month extension to submit a "MACT Hammer" Part 2 Application. The reasons GP gave for the extension included the fact that, at the time of our request, EPA was required by court order to issue a proposed rule by July 2009 and a final rule by July 2010. The extension was necessary in part to allow GP time to consider EPA's proposed rule and factor it into the Part 2 application. In a letter dated March 19, 2009, ODEQ granted an extension until September 15, 2009.

On June 30, 2009, the court order was amended, changing the EPA proposal deadline to September 15, 2009. EPA is in the process of gathering available stack emissions and fuel data for the affected sources, and to fill data gaps, EPA has sent CAA section 114 letters requiring stack emission and fuel testing at selected facilities. The test results are due to EPA by October 15, 2009. We



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax



February 9, 2009

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for January 12-14, 2009, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Al Deichsel'.

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450



**Georgia-Pacific**

File \_\_\_\_\_  
Enf/comp ☒ \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

November 12, 2010

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received  
NOV 15 2010  
Office Of Air, Waste  
And Toxics

**RE: SUBPART MM 3rd QUARTER 2010 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2010 Third Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

*Michael D. Tompkins*

Michael D. Tompkins  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



**Georgia-Pacific**

Received

NOV 18 2010  
Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

File \_\_\_\_\_  
Enf/comp ☒ \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

November 12, 2010

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for October 19-21, 2010, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450



Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 28, 2011

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; January 1 through June 30, 2011. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. \* The total of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,



Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

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Received  
AUG 03 2011  
Office Of Air, Waste  
And Toxics

Received  
FEB 05 2007  
Office Of Air, Waste  
And Toxics



January 30, 2007

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2006 4th QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2006 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 164 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter.

During the month of December we experienced a communication failure between a programmable logic controller (PLC) and the personal computer (PC) for the data acquisition system. Due to the nature of the malfunction, troubleshooting involved several different qualified experts to resolve and correct the communication failure. First, it was determined that all of the PLCs associated with the monitoring system were operating properly. Secondly, the communications cable was checked to verify it was not an issue. Then it was determined the DOS based PC was the issue; however, the DOS consultant verified the system was operating properly. However, the DOS consultant, performed some additional tests on a converter associated with the communications cable and believed this was the issue. We immediately ordered a new converter, which when it was installed the system returned to normal operation with respect to collecting calibrations and data from the analyzers. Although the analyzers data was being captured on the Mill wide computer system, the calibrations were not obtained. Instrument technicians began to perform manual calibrations and record the data prior to the converters arrival on the mill site.

During the December time period described above the system was still in operation. Assuming the data is valid, all daily average nitrogen oxide emissions were in the range of 0.22 to 0.27 lb/MMBtu and the potential 30 day averages were 0.23 to 0.24 lb/MMBtu. The nitrogen oxide emission limit is no emissions greater than 0.30 lb/MMBtu.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

*Frank Wash for JRJ*

James R. Jordan  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



Georgia-Pacific

*Wanna mill*

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

December 1, 2008

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received

DEC 04 2008

Office Of Air, Waste  
And Toxics

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for the fourth quarter 2008, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please call me at (503) 455-3370.

Sincerely,

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450





Georgia-Pacific Consumer Products LP

Received

MAY 04 2009

Office Of Air, Waste  
And Toxics

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

April 27, 2009

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2009 1<sup>st</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2009 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 152 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The quarterly cylinder gas audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

November 16, 2009

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for October 20-22, 2009, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450

**Received**  
**NOV 25 2009**  
**Office Of Air, Waste  
And Toxics**



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

Received  
AUG 03 2009  
Office Of Air, Waste  
And Toxics

July 29, 2009

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for July 7-9, 2009, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

This test also was designed to demonstrate that acceptable methanol destruction was achieved with a total of 18 aerators in operation. A performance test in done in November 2002, had demonstrated that 22 aerators were adequate. The current test shows that with 18 aerators in operation, compliance with the methanol destruction requirement is achieved.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450



**Georgia-Pacific**

*Georgia-Pacific Consumer Products LP*

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

January 23, 2009

**Received**

**JAN 28 2009**

**Office Of Air, Waste  
And Toxics**

**CERTIFIED MAIL: 7007 0710 0000 2160 6153**

Andrew Ginsburg  
Oregon Department of Environmental Quality  
811 SW Sixth Avenue  
Portland, OR 97204

**Re: Georgia-Pacific Consumer Products LP; Wauna Mill  
Boiler MACT 112(j) Part 1 Application and Request for Part 2  
Extension**

Dear Mr. Ginsburg:

As you know, the U.S. Court of Appeals for the D.C. Circuit vacated and remanded the federal Boiler MACT rule (40 CFR Part 63, Subpart DDDDD) in its entirety in a June 8, 2007 decision (made effective in the Court's July 30, 2007 mandate). U.S. EPA is working to re-promulgate the rule, which requires it first to properly categorize and distinguish boilers and process heaters under Clean Air Act section 112 from solid waste incinerators under CAA section 129, and is required by court order to issue a proposed rule by July 2009 and a final rule by July 2010.

The Court's vacatur raised the issue of whether the so-called "MACT hammer" provision in CAA section 112(j) had been triggered. By its own terms, the MACT hammer -- which requires sources to submit permit applications for, and permitting agencies to issue, permits containing case-by-case MACT standards "equivalent to the limitation that would apply to such source if an emission standard had been promulgated in a timely manner" -- is triggered only when EPA "fails to promulgate" a required MACT standard by its established deadline. EPA's 112(j) regulations reiterate that the obligations contained therein only apply where "the Administrator has failed to promulgate an emission standard under this part on or before an applicable section 112(j) deadline", and they require sources to submit applications only where "the owner or operator can reasonably determine



that one or more sources at the major source belong in the category or subcategory subject to section 112(j)." See 40 CFR 63.52(a).

The Department's December 2008 guidance to potentially-affected sources declined to take a position on whether vacatur of the Boiler MACT rule triggered the MACT hammer, and advised sources to seek their own legal advice on the issue. We believe that the vacatur did not trigger the MACT hammer and that, therefore, there is no obligation on sources to submit permit applications under section 112(j) and 40 CFR 63.52(a)(1). First and foremost, EPA did not "fail to promulgate" Boiler MACT by its agreed deadline; rather, EPA duly promulgated the rule before the deadline<sup>1</sup> and only later, upon challenge by various environmental and other petitioners, a court overturned and remanded the rule to EPA. Neither section 112(j) nor EPA's 112(j) rules were intended to address the situation where a rule is duly promulgated and then later vacated. We believe these provisions cannot be "made to fit" that situation via mere interpretation.

Second, when the D.C Circuit vacated Boiler MACT, it did so on the basis that, because EPA erred in defining "commercial or industrial waste" under the CISWI definitions rule, it potentially mis-characterized some boilers and process heaters that may actually belong in the section 129 "solid waste incinerators" category. Because this threshold error cast doubt on the entire category of "boilers and process heaters" and on the MACT floor determination for that category, the court decided (without addressing the legality of any of the substantive Boiler MACT provisions) that the entire Boiler MACT rule needed to be vacated. In short, the vacatur called into question the entire Boiler MACT category and made its reestablishment dependent on proper categorization under the incinerator rule. Hence, there is at least arguably no currently-valid MACT category for the set of units previously subject to the vacated Boiler MACT rule. As 40 CFR 63.52(a)(1) only requires a case by case MACT determination application if the source can "reasonably determine" that one or more sources are within a particular MACT category, we believe that the threshold requirement for submitting an application is not present.

Third, as a practical matter and as EPA has repeatedly conceded, it has no current authority to implement the hammer rules -- and in fact those rules have no force or effect -- because EPA does not have a valid OMB-issued Information Collection Request control number under the Paperwork Reduction Act (PRA). In other words, EPA has not received the necessary approval from OMB to implement 112(j), meaning sources are under no obligation to act pursuant to those rules and

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<sup>1</sup> EPA missed its original November 15, 2000 deadline for promulgating the Boiler MACT rule, but signed the final rule on February 26, 2004, before the May 15, 2004 deadline agreed to in a November 26, 2002 settlement agreement.

no person can enforce them. When and if OMB approves EPA's pending ICR request, that will resolve this particular deficiency, though of course it will not resolve the first two issues described above.

Notwithstanding these positions, and assuming for the sake of argument that the hammer has been triggered, Georgia-Pacific understands that section 112(j) itself could be interpreted as imposing a direct obligation on sources to submit case-by-case MACT applications despite the ambiguity surrounding the source categories and despite EPA's lack of an approved ICR. Therefore, we are submitting the attached Part 1 application, consistent with 40 CFR 63.52(a)(1) and (e) and 63.53, as incorporated by Oregon at OAR 340-244-0210(2), to fulfill any such legal obligation. We are following EPA's MACT hammer regulations in this regard, including EPA's established two-part application process<sup>2</sup>, and believe submittal of this Part 1 satisfies any requirement to submit a "permit application" "beginning 18 months after [the MACT hammer date]" under section 112(j).<sup>3</sup> Assuming the hammer was triggered by the Court's action, we believe that the 18-month period for applications began to run from issuance of the court's mandate on July 30, 2007, as the vacatur was not effective and the rule remained in force until the mandate issued. Therefore, the deadline (if there is one) for this Part 1 application is January 30, 2009, and today's submission is timely.

---

<sup>2</sup> EPA's April 5, 2002 amendments to the 112(j) regulations created the two-part application process. In its response to comments on the rule changes finalized in April 2002, EPA said that *"the hammer provision in section 112(j)(2) itself establishes the requirement to submit permit applications 'beginning 18 months after' the statutory date for promulgation of a standard. Reading this provision in context, we believe that the statute can be reasonably construed as authorizing us to provide a period of time after the hammer date in which the information necessary for a fully informative section 112(j) application can be compiled"*. EPA went on to state that it *"received no adverse comment on requiring that the first portion (Part 1) of the section 112(j) application be due on the hammer date. We think that this is the minimum required by the statute. ... Failure to meet the 112(j) requirements, including failure to make a timely Part 1 application, can lead to enforcement action. If a source is unsure about its applicability, it should submit a Part 1 application requesting an applicability determination to the permitting authority, which will then make a determination of MACT applicability."* This history demonstrates that, in EPA's view, submittal of a Part 1 application by the section 112(j) deadline satisfies a source's obligation under section 112(j).

<sup>3</sup> To the extent someone could interpret it otherwise, to require submittal of both a Part 1 and Part 2 application by the 112(j) deadline, we refer to information that we have previously submitted with respect to the regulated Boiler MACT units at this facility. As EPA has recently stated, *"for many sources the permitting authority already has much of this [i.e., the Part 2-required] information, gathered through previous Title V permit submittals. A source may work with its permitting authority to determine what additional or revised information is necessary for a complete Part 2 application submittal."* See Supporting Statement, Information Collection Request for Requirements for Control Technology Determinations from Major Sources In Accordance with Clean Air Act Sections 112(g) and 112(j), at 9, 10, 12 (supporting final ICR, April 2008).



## Part 2 Extension Request

Assuming the MACT hammer has been triggered and that EPA's MACT hammer regulations apply notwithstanding the PRA issues described above, those regulations would ordinarily require submission of a Part 2 application within 60 days of the deadline for submitting the Part 1, unless that deadline is extended. *See* 40 CFR 63.52(e). In light of ODEQ's December 2008 guidance declining to take a position on whether hammer applications are required at all, and conceding that any timelines for such applications are not clear, we intend not to submit a Part 2 application and the associated permit application fee for a significant Title V modification until such time as the Department informs us that one is due. Alternatively, Georgia-Pacific hereby respectfully requests an extension to the 60-day deadline pursuant to 40 CFR 63.1(a)(12) and 63.9(i), as incorporated by Oregon at OAR 340-244-0210(2), for the reasons given below.

Under the Boiler MACT re-promulgation schedule recently agreed to by EPA and environmental group litigants, EPA must propose a new rule by July 15, 2009 and finalize that rule a year later, by July 15, 2010. If EPA holds to that schedule, as we must assume, then it is likely given the timeline for establishing 112(j) case-by-case limits that promulgation of the new federal standard will overtake any state process for setting the 112(j) standards, and all of the work by sources and the Department in applying for and developing the case-by-case requirements will have been for nothing. In light of this fact, if the Department determines that a Part 2 application is due, we respectfully request a six-month extension to submit the more resource-intensive Part 2s. This additional time will take us just beyond the July 2009 deadline for EPA to propose the re-promulgated Boiler MACT rule. Assuming EPA meets its deadline, that will demonstrate that it is on course to meet the repromulgation schedule, and GP may seek the Department's agreement at that time that an additional extension period is appropriate.

This extension request is further supported by the fact that the Wauna Mill's fluidized bed boiler (FBB) [EU #35] burns materials other than fossil fuel, including wastewater treatment residuals and hog fuel. Until EPA defines "solid waste" for purposes of a revised CISWI definitions rule, we cannot reasonably determine with any certainty whether this unit will be regulated under the new Boiler MACT rule or under the section 129 solid waste incinerator rule. EPA provided its initial thoughts on this issue and on the various criteria that might be applied in distinguishing "wastes" from "fuels" in a January 2, 2009 Advanced Notice of Proposed Rulemaking<sup>4</sup>, but that was just the beginning of a longer rulemaking process that will determine which MACT category units such as the FBB belong in. To the extent the Department determines that a Part 2 application is due, an extension of the deadline for filing such an application until EPA provides more certainty on this issue is necessary to inform Georgia-Pacific on the required contents of the Part 2 and to inform the agency on how to appropriately

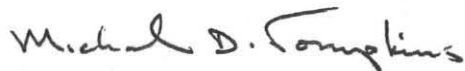
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<sup>4</sup> "Identification of Non-Hazardous Materials That Are Solid Waste", 74 Fed. Reg. 41 (Jan. 2, 2009).

process the application. We respectfully request ODEQ's determination of whether a Part 2 application is due or, alternatively, its decision on this request for a six-month extension of the Part 2 deadline, within four weeks of the date of this letter.

If you have any questions about this letter or the enclosed Part 1 application, please feel free to call Mike Crawford on my staff at (503) 455-3233.

Sincerely,

A handwritten signature in dark ink, reading "Michael D. Tompkins". The signature is written in a cursive style with a large, stylized "M" and "T".

Michael D. Tompkins  
Vice President / Mill Manager

c: Nancy Helm, EPA Region X  
George Davis, ODEQ NW Region; Air Quality Division  
Alan Stinchfield, Georgia-Pacific





**Georgia-Pacific**

*Georgia-Pacific Consumer Products LP*

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

File \_\_\_\_\_  
Enf/comp \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

January 26, 2010

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for January 12-14, 2010, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450



Received

MAR 12 2010

Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 10, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; July 1 through December 31, 2009. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total of all excess emissions from the bleaching system, hard pipe treatment system, backup thermal oxidizer, noncondensable gas venting and high volume low concentration venting was less than the one percent for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, backup thermal oxidizer, noncondensable gas, and high volume low concentration were less than five percent for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

August 14, 2012

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received  
AUG 20 2012  
Office Of Air, Water  
And Toxics

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for July 10-12, 2012, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

A handwritten signature in black ink, appearing to read 'Al Deichsel'.

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

March 13, 2012

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period of July 1 through December 31, 2011. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent of total operating time for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

Received  
MAR 14 2012  
Office Of Air, Waste  
And Toxics





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

March 13, 2012

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received  
MAR 14 2012  
Office Of Air, Waste  
And Toxics

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period of July 1 through December 31, 2011. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:


1. The total duration of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent of the total operating time for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent of the total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received  
MAR 14 2012  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

Received

FEB 06 2012

Office Of Air, Waste  
And Toxics

January 26, 2012

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for January 3-5, 2012, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

A handwritten signature in black ink, appearing to read 'Al Deichsel'.

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450



**Georgia-Pacific**

File \_\_\_\_\_  
Enf/comp ☒ \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 30, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received  
AUG - 2 2010  
Office Of Air, Waste  
And Toxics

**RE: SUBPART MM 2nd QUARTER 2010 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2010 Second Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

*Michael D. Tompkins*

Michael D. Tompkins  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



File \_\_\_\_\_  
Enf/comp ☒ \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 28, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received  
AUG - 2 2010  
Office Of Air, Waste  
And Toxics

Re: **MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; January 1 through June 30, 2010. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

*Michael D. Tompkins*

Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101





File \_\_\_\_\_  
Enf/comp ☒ \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 28, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received  
AUG - 2 2010  
Office Of Air, Waste  
And Toxics

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; January 1 through June 30, 2010. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total of all excess emissions from the bleaching system, hard pipe treatment system, backup thermal oxidizer, noncondensable gas venting and high volume low concentration venting were less than one percent for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, backup thermal oxidizer, noncondensable gas, and high volume low concentration were less than five percent for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,

*Michael D. Tompkins*

Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

I:\mike\air\ssm\ssm-excess-emissions-monitoring-summary-letter-1st-semi-10.doc



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 25, 2008

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; January 1 through June 30, 2008.

All excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the allowable for the six-month period, excluding the startups, shutdowns, and malfunctions. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent allowable, excluding the startups, shutdowns, and malfunctions.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

A handwritten signature in cursive script, reading 'Michael D. Tompkins'.

Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 25, 2008

Mr. George F. Davis.  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2008 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT  
(January 1 through June 30, 2008)**

Dear Mr. Davis:

Please, find enclosed two copies of the 2008 first semi-annual compliance certification report for the Fort James Operating Company's Wauna Mill. We are submitting this report prior to July 30, 2008 as required in the Air Operating Permit 04-0004, condition 154.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

Enclosure

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E – Rptng Req 70



**Georgia-Pacific**

Received

MAR 17 2010

Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 15, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 4th QUARTER 2009 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2009 Fourth Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101





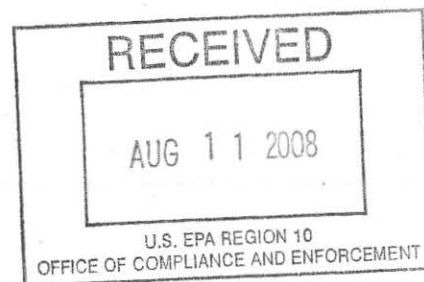
**Georgia-Pacific**

*Georgia-Pacific Consumer Products LP*

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

August 8, 2008

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201



**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for the second quarter 2008, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please call me at (503) 455-3236.

Sincerely,

Jeff Sorensen  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 25, 2008

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; January 1 through June 30, 2008.

All excess emissions from the bleaching system, hard pipe treatment system, backup thermal oxidizer, noncondensable gas venting and high volume low concentration venting were less than the allowable for the six-month period.

During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, backup thermal oxidizer, noncondensable gas, and high volume low concentration were less than the five percent allowable.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

I:\mike\air\ssm\ssm-excess-emissions-monitoring-summary-letter-1st-semi-08.doc



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

Received

17 2008

Office Of Air, Waste  
And Toxics

March 13, 2008

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; July 1 through December 31, 2007.

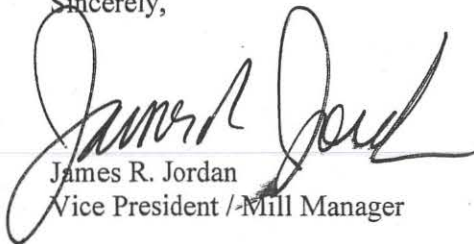
All excess emissions from the bleaching system, hard pipe treatment system, backup thermal oxidizer, noncondensable gas venting and high volume low concentration venting were less than the one percent allowable for the six-month period.

During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, backup thermal oxidizer, noncondensable gas, and high volume low concentration were less than the five percent allowable.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,



James R. Jordan  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20



Georgia-Pacific

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 13, 2008

Received  
17 2008  
Office Of Air, Waste  
And Toxics

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; July 1 through December 31, 2007.

All excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent allowable for the six-month period, excluding the startups, shutdowns, and malfunctions. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent allowable, excluding the startups, shutdowns, and malfunctions.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

James R. Jordan  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101





Received

AUG 02 2007

Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 25, 2007

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; January 1 through June 30, 2007.

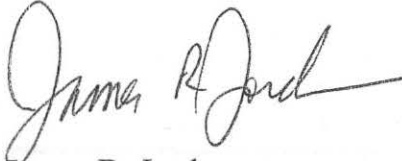
All excess emissions from the chemical recovery furnace and lime kiln were less than the one percent allowable for the six-month period. However, the pressure drop recorded for the smelt dissolving tank scrubber was outside the lower boundary. This scrubber is a dynamic/wet fan system that requires a minimum scrubbant flow rate for proper operation. During the episodes the scrubber pressure drop was outside the lower boundary, the flow rate was above the lower boundary for this system. The pressure drop is just an indicator for system plugging. We have performed additional stack tests, while trying to simulate the conditions, low pressure drop across the scrubber and normal scrubbant flow to the scrubber. In addition, we conducted more tests while simulating low pressure drops and low scrubbant flow to the scrubber. The preliminary test results indicate the particulate emissions were well below the emission limit. We are in the process of the reviewing the final draft and will forward a copy to you, soon.

During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent allowable.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Jordan". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

James R. Jordan  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Avenue  
Seattle, WA 98101



Received

AUG 03 2007

Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 24, 2007

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; January 1 through June 30, 2007.

All excess emissions from the bleaching system, hard pipe treatment system, backup thermal oxidizer, noncondensable gas venting and high volume low concentration venting were less than the one percent allowable for the six-month period.

During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, backup thermal oxidizer, noncondensable gas, and high volume low concentration were less than the five percent allowable.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,

James R. Jordan  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

**Received**

**APR 10 2007**

**Office Of Air, Waste  
And Toxics**

April 9, 2007

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for February 6-8, 2007, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please call me at (503) 455 - 3667.

Sincerely,

Thor Sorenson  
Senior Process Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450





March 13, 2007

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received

MAR 19 2007

Office Of Air, Waste  
And Toxics

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; July 1 through December 31, 2006.

All excess emissions from the bleaching system, hard pipe treatment system, backup thermal oxidizer, noncondensable gas venting and high volume low concentration venting were less than the one percent allowable for the six-month period.

During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, backup thermal oxidizer, noncondensable gas, and high volume low concentration were less than the five percent allowable.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,

*Frank Wash for JRJ*

James R. Jordan  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20



March 13, 2007

Received

MAR 21 2007

Office Of Air, Waste  
And Toxics

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; July 1 through December 31, 2006.

All excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent allowable for the six-month period, excluding the startups, shutdowns, and malfunctions. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent allowable, excluding the startups, shutdowns, and malfunctions.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

*Frank Walsh for JRS*

James R. Jordan  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received

MAY 01 2006

Office Of Air, Waste  
And Toxics

FORT JAMES



April 27, 2006

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016

**RE: FLUID BED BOILER 2006 1st QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2006 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 164 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. As you know from our 2005 fourth quarter report, however, we experienced a greater than normal amount of data exclusion due to an error in maintaining calibration gas for the system from January 3<sup>rd</sup> until January 26<sup>th</sup>. During the January time period the system was still in operation. Assuming the data is valid, as we believe, all daily average nitrogen oxide emission were in the range of 0.23 to 0.28 lbs. / MMBtu, and all hourly emissions were less than 0.30 lbs. / MMBtu, which is the limit based on a 30 day rolling average.

The mill has increased our inventory of spare cylinders and revised the standard operating procedure for replacing depleted calibration gas cylinders with a full cylinder. The procedure includes handling and notifying the purchasing department of a depleted calibration gas cylinder for refill. The Instrument Technicians in the Maintenance Department who are responsible for maintaining the system have received the revised standard operating procedures.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

  
James R. Jordan  
Vice President / Mill Manager

This 4/27/2006 Rpt. is on  
"Fort James Oper. Co."  
Letterhead.

(B. Hill  
1-29-16)

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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Latest Compliance rpt. I found  
was in the most recent "Ent/Comp"  
file for Fort James that is still on  
(CRC) shelf. It's dated 10/24/2006  
The Most recent Fort James  
Permit Renewal on our shelves is  
dated 10-11-2006.



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

Received

APR 15 2008

Office Of Air, Waste  
And Toxics

April 10, 2008

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for February 11-13, 2008, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3236.

Sincerely,

A handwritten signature in black ink, appearing to read 'JS', followed by a long horizontal line.

Jeff Sorensen  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 28, 2011

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; January 1 through June 30, 2011. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received  
AUG 03 2011  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 28, 2011

Mr. George F. Davis  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2011 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT  
(January 1 through June 30, 2011)**

Dear Mr. Davis:

Please find enclosed two copies of the 2011 first semi-annual compliance certification report for the Georgia-Pacific Consumer Products LP Wauna Mill. We are submitting this report by July 30, 2010 as required in the Air Operating Permit 04-0004, condition 154.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

A handwritten signature in cursive script, appearing to read 'Michael D. Tompkins'.

Michael D. Tompkins  
Vice President / Mill Manager

Enclosure

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E – Rprtnq Req 70



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

August 16, 2011

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received  
AUG 23 2011  
Office Of Air, Waste  
And Toxics

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for August 1-3, 2011, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

July 26, 2013

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 2<sup>nd</sup> QUARTER 2013 REPORT**

Dear Mr. Davis:


Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2013 Second Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions from the chemical recovery furnace, smelt dissolving tank and lime kiln, were less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

  
Steve R. Francoeur  
Vice President / Mill Manager

Attach.

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received  
AUG 12 2013  
Office Of Air, Waste  
And Toxics





Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 26, 2013

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period of January 1 through June 30, 2013. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent of the total operating time for the six-month period; and
2. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent of the total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Steve R. Francoeur'.  
Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received  
AUG 1 2 2013  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 26, 2013

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: Cluster Rule Excess Emissions and Continuous Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period of January 1 through June 30, 2013. We are submitting only the Summary Report pursuant to 40 CFR 63.10(e)(3)(vii) because:

1. The total duration of all excess emissions from the bleaching system, hard pipe treatment system, low volume high concentration venting, and high volume low concentration venting were less than one percent of total operating time for the six-month period; and
2. During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, low volume high concentration, and high volume low concentration were less than five percent of total operating time for the six-month period.

All actions taken during SSM events were consistent with the Mill's SSM Plans.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 455 - 3233.

Sincerely,

Steve R. Francoeur  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

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Received  
AUG 12 2013  
Office Of Air, Waste  
And Toxics



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
www.gp.com

July 28, 2011

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2011 2<sup>nd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2011 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 148 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The continuous emission monitoring system relative accuracy test audit (RATA), which passed, is enclosed for your reference.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtng Req 50

Received  
AUG 03 2011  
Office Of Air, Waste  
And Toxics

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



**Georgia-Pacific**

**RECEIVED**

**FEB 06 2008**

Office of Air Waste & Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

January 28, 2008

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2007 4th QUARTER AIR REPORT**

Dear Mr. Davis:

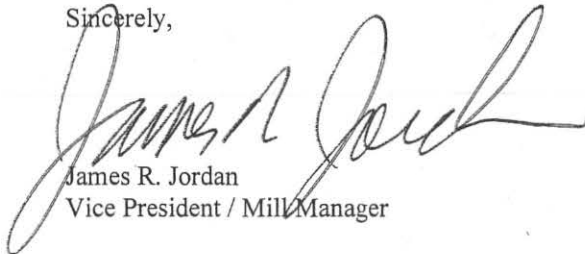
Enclosed with this letter is the 2007 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 152 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The quarterly cylinder gas audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,



James R. Jordan  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



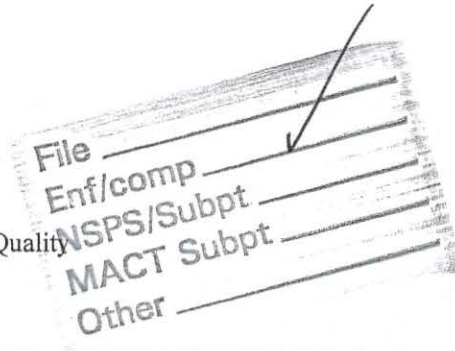


Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

October 26, 2007

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201



**RE: FLUID BED BOILER 2007 3rd QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2007 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 152 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The quarterly cylinder gas audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

James R. Jordan  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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**Received**  
**NOV 01 2007**  
**Office Of Air, Waste**  
**And Toxics**

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

April 28, 2008

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

RECEIVED  
MAY 02 2008  
Office of Air Waste & Toxics

**RE: FLUID BED BOILER 2008 1st QUARTER AIR REPORT**

Dear Mr. Davis:


Enclosed with this letter is the 2008 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 152 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The quarterly cylinder gas audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,



James R. Jordan  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

January 28, 2009

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received  
FEB 02 2009  
Office Of Air, Waste  
And Toxics

**RE: FLUID BED BOILER 2008 4th QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2008 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 152 in our Title V Operating Permit No. 04-0004. There were no nitrogen oxide emission exceedences during the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

File: Rprtng Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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**JAMES RIVER CORPORATION**  
WAUNA MILL  
Clatskanie, Oregon 97016 (503) 455-2221

December 30, 1994

Ms. Jill Inahara  
Oregon Department of Environmental Quality  
Air Quality Division  
811 SW Sixth Ave.  
Portland, OR 97204

Dear Ms. Inahara:

In response to the request letter from Mr. John Ruscigno, dated Dec. 21, 1994, I am enclosing the original certification page (Form AP101) for the Federal Operating Permit application. Mr. Ruscigno indicated that the original of this signature is required for your files.

Future certifications made to your department will include at least one original signature page.

If you have any questions, please contact me at (503) 455-3233.

Sincerely,



Thor Sorenson

cc: Mike Woods  
File E510.1.1

RECEIVED  
JAN 04 1995

AIR QUALITY DIVISION  
Dept. Environmental Quality





**JAMES RIVER CORPORATION**

WAUNA MILL

Clatskanie, Oregon 97016 (503) 455-2221

January 5, 1995

Ms Jill Inahara  
Oregon Department of Environmental Quality  
Air Quality Division  
811 SW Sixth Ave.  
Portland, OR 97204

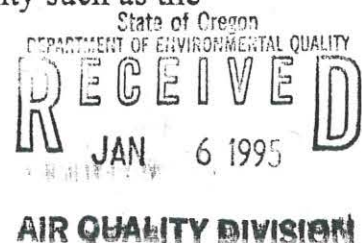
Dear Ms Inahara:

This letter and the attached documents are in response to your telephone request for more information about the James River Wauna Mill Title V permit application.

Some of the documentation which you requested had to do with Plant Site Emission Limits contained in Wauna's existing Air Contaminant Discharge Permit. OAR 340-28-1010 states that

- (2) The emissions limits established by PSELs shall provide the basis for:
- (a) Assuring reasonable further progress toward attaining compliance with ambient air standards;
  - (b) Assuring that compliance with ambient air standards and Prevention of Significant Deterioration increments are being maintained;
  - (c) Administering offset, banking and bubble programs;
  - (d) Establishing the baseline for tracking consumption of Prevention of Significant Deterioration Increments.

It is clear to us that the PSEL regulations were intended to regulate total emissions from plant sites. They were not intended to add another layer of regulation to individual emission sources within a complex production facility such as the Wauna Mill.



As you know, Wauna's existing ACDP contains estimates of emissions from various emission units. These estimates are summed to calculate a facility-wide PSEL for each regulated pollutant. We agree that facility-wide PSELs are applicable requirements. The mill is obligated to make a good faith effort to estimate actual emissions and control estimated emissions to levels below the facility-wide PSELs.

During discussions surrounding issuance of Wauna's current ACDP, it became clear that the Department believes that the individual emission estimates used to develop facility-wide PSELs are themselves enforceable limits. We do not agree with that interpretation. The individual emission estimates are derived in a variety of ways, depending on the amount of data available. Some estimates are calculated from the pollutant concentration required by statute times the design air flow for the control device. For sources where there is a long history of monitoring data, the emission estimate is the average measured emission factor plus three standard deviations times the maximum annual production rate. For sources where there is limited data, the emission estimate is the average emission factor derived from available data times the maximum production rate. In some cases, the data used to develop emission factors is scant and may be derived from tests at other facilities. These methods of estimating emissions are adequate for estimating the impact of an entire facility on its airshed, but they are not appropriate for setting limits on individual sources within a facility.

In the Title V application process, plants were given the option of requesting facility-wide or emission-unit-specific PSELs. Wauna requested facility-wide PSELs. Our understanding is that you need the attached paperwork

The Kamyr digester has a maximum capacity of 895 ADUT/day which is equivalent to 67,000 lbs/hr of bone dry unbleached pulp. Annual average Kamyr digester production is typically about 240,000 ADUT/yr. The Kamyr digester production rate sets the production rate of its associated brown stock washer line.

The 1st and 2nd stage filtrate tank vents are connected to the Kamyr foam tank which is in turn connected to the mill non-condensable gas collection and incineration system. These tanks can also vent to the atmosphere. The rewash filtrate tank has only one vent which is to atmosphere.

The M & D digester has a maximum capacity of 373 ADUT/day which is equivalent to 28,000 lbs/hr of bone dry unbleached pulp. Annual average M & D digester production is typically about 90,000 ADUT/yr. The M & D digester production rate sets the production rate of its associated brown stock washer line.

The 1st and 2nd stage filtrate tank vents are connected to the M & D foam tank which is in turn connected to the mill non-condensable gas collection and incineration system. These tanks can also vent to the atmosphere. The rewash filtrate tank has only one vent which is to atmosphere.



**JAMES RIVER CORPORATION**

WAUNA MILL

Clatskanie, Oregon 97016 (503) 455-2221

January 5, 1995

Ms. Jill Inahara  
Department Of Environmental Quality  
Air Quality Division  
811 SW Sixth Ave.  
Portland, OR 97204

Dear Jill:

In reply to your request for clarification of certain items in our Title V application I've put together and enclosed the following information:

- I've enclosed a revised DV201 process description form for PR-391, the black liquor filtrate and storage tank system. I've combined the information from DV201's submitted for PR-391 and PR-394 to accomplish this. This conforms to the format of the rest of the application, which treats these filtrate tanks as one process unit.
- There was also a need for a unique ID number for our #3 weak liquor tank. In the application it was identified as DP-311, the same number as our #2 weak liquor tank. Please change the identification number for #3 weak liquor tank to DP-322.
- I've enclosed revised forms to address the inclusion of equipment specific PSEL from the current ACDP as currently applicable requirements for the mill, while still structuring the application to result in millwide PSEL only. A letter from Mike Woods is included which clarifies our position.

If you have any questions, please contact me at (503) 455-3233.

Sincerely,

Thor Sorenson

cc: Mike Woods  
File E510.1.1

RECEIVED  
JAN 06 1995

AIR QUALITY DIVISION  
Dept. Environmental Quality





**JAMES RIVER CORPORATION**

WAUNA MILL

Clatskanie, Oregon 97016 (503) 455-2221

April 28, 1995

Ms. Jill Inahara

Department Of Environmental Quality

Air Quality Division

811 SW Sixth Ave.

Portland, OR 97204

Dear Jill:

In reply to your request for clarification of certain items in our Title V application I've put together and enclosed the following information:

- Information is still not available for continuous emission monitoring systems being designed for the Fluidized Bed Boiler. The final selection of the vendor is ongoing, and the CEMS specifications will depend on the specific vendor. This information will be forwarded as it becomes available.
- Attached is the miscellaneous device/process description form for EU-38 PR-368 Misc. process device that was missing from your set.
- Attached is a revised page for PR-605 #5 P/M Nat. Gas burner. The Heat Input (BTU/hr) is 62MM.
- I've enclosed a package of report pages which contain the emission factor basis for the PSEL calculations. Each of the pages of the emission detail sheets is attached to the report pages with the appropriate numbers.

Our shutdown is occurring the week of May 22. The best time for you and George to come by would be midweek, maybe Wednesday or Thursday, to get a look at the most equipment. Please let me know what works best for you.

If you have any questions, please contact me at (503) 455-3233.

Sincerely,

Thor Sorenson

cc: Mike Woods  
File E510.1.1

RECEIVED  
MAY 01 1995

AIR QUALITY DIVISION  
Dept. Environmental Quality

August 11, 1994

Mr. Mike Woods  
James River Corporation  
Wauna Mill  
Clatskanie, OR 97016

Dear Mike:

James River Corporation contracted Am Test-Air Quality, Inc. to quantify emissions of total reduced sulfur (TRS) as sulfur dioxide ( $\text{SO}_2$ ) and hydrogen sulfide ( $\text{H}_2\text{S}$ ) from the sources referenced below at James River Corporation's Wauna Mill in Clatskanie, Oregon.

- Brown Stock Washer Vent (North and West)
- Ash Mix Tank Vent

The methodology which was used to collect the emission samples is discussed in the July 1, 1993 edition of the Environmental Protection Agency (EPA) document Title 40, Code of Federal Regulations, Part 60 (40 CFR 60), Appendix A, Methods 1, 2, 3A, 6C and 16A. Methods 1 and 2 were performed to measure the gas velocity and temperature for calculating the volumetric flow rate. Method 3A was used to calculate the molecular weight of the stack gas, based on ambient levels of oxygen ( $\text{O}_2$ ) and carbon dioxide ( $\text{CO}_2$ ). Due to the low temperature and saturated condition of the stack gas, psychrometry was utilized to determine the moisture content of the stack gas. A combination of Methods 16A and 6C were utilized to quantify emissions of total reduced sulfur (TRS). Integrated samples of gas were collected by first bubbling the gas through a citrate buffer solution to scrub sulfur dioxide ( $\text{SO}_2$ ), and then the gas was collected in a 10 liter Tedlar bag. The gas was then passed through a thermal oxidizer to convert TRS compounds to  $\text{SO}_2$ , and then an ultraviolet  $\text{SO}_2$  analyzer was used to measure the parts per million (ppm) TRS as  $\text{SO}_2$ . TRS as hydrogen sulfide ( $\text{H}_2\text{S}$ ) emission rates were calculated in units of pounds per hour (lb/hr) and tons per year (tons/yr). Production data provided by James River Paper Co. personnel were utilized to calculate TRS emission factor results in units of pounds of pollutant per equivalent air dried ton of pulp processed (lb/TADP).



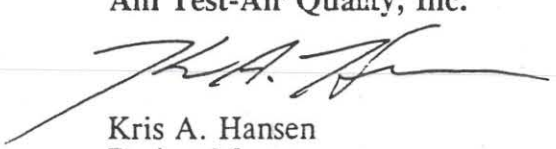
Three (3) TRS samples were collected in Tedlar<sup>R</sup> bags at the north Brown Stock Washer Vent on June 30, 1994. During each Method 16A/6C test, velocity, temperature and psychrometric moisture determinations were made at each stack (north and west). TRS emission rate results were calculated using the combined airflow from both stacks. A summary of the results for the Brown Stock Washer Vent is attached on page 4 in a computer printout titled "Methods 1, 2, 3A and Total Reduced Sulfur Results".

Three (3) TRS samples were collected in Tedlar<sup>R</sup> bags at the Ash Mix Tank Vent on June 30, 1994. Velocity, temperature and psychrometric moisture determination data collected on August 8, 1994 were utilized to calculate TRS emission rate results. A summary of the results for the Ash Mix Tank Vent is attached on page 5 in a computer printout titled "Methods 1, 2, 3A and Total Reduced Sulfur Results".

Mr. Kevin P. Orton, Mr. Stanley B. Moye and Mr. Jeffrey S. Harris of Am Test-Air Quality, Inc. conducted the field sampling and TRS analyses. Mr. Kris A. Hansen, Ms. Angela F. Blaisdell, Ms. Judy A. Aasland and Ms. Amy M. Brotherton of Am Test-Air Quality, Inc. performed data reduction, quality assurance review, and report preparation.

Please find enclosed three (3) copies of this letter and the data package which includes a summary table of results, separate computer printouts for each run, example calculations of results, and field data sheets. Please contact our office if you have any questions or require further information.

Sincerely,  
Am Test-Air Quality, Inc.



Kris A. Hansen  
Project Manager

KAH/AFB/ja  
Enclosure  
[jaal:c:\w\tr\JRTRSLT3]



**FORT JAMES**



**\*\* HAND CARRIED \*\***

*Fort James Corporation  
Wauna Mill  
Clatskanie, OR 97016*

*telephone 503 455 2221*

November 19, 1999

Mr. George Davis  
Northwest Region  
Oregon Department of Environmental Quality  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Dear Mr. Davis,

The attached Prevention of Significant Deterioration (PSD) permit application is being submitted for your review and approval. Included are four copies of the application plus a set of floppy discs containing emissions data, the air modeling runs, and modeling information. Also attached is a check in the amount of \$41,308 to cover the necessary permit processing and review fees. We appreciate the help you and your office have given us in preparing this document over the past several months.

Should you have any questions, please contact either of the following: Ms. Carol Whitaker, Fort James Corp., Camas, WA (360) 834-8390, or Ms. Candice Hatch, IDC, Portland, OR (503) 423-3998, ext. 23983.

Again, thank you for your help. We look forward to working with you.

Yours truly,

Mark W. Schneider  
Interim General Manager

Attachments:

Permit Application (4)  
Check





**JAMES RIVER CORPORATION**

WAUNA MILL

Clatskanie, Oregon 97016 (503) 455-2221

September 22, 1995

Ms. Jill Inahara  
Department Of Environmental Quality  
Air Quality Division  
811 SW Sixth Ave.  
Portland, OR 97204

RECEIVED  
SEP 27 1995

AIR QUALITY DIVISION  
Dept. Environmental Quality

Dear Jill:

In reply to your request for clarification of certain items in our Title V application I've put together and enclosed the following information:

- Aggregate Insignificant Source Documentation Document . The attached modified aggregate insignificant form contains references and attachments that show the origin of the data used for estimating emissions from the indicated insignificant sources.
- 
- Source of VOC Calculations: The VOC values were taken by adding up the speciated values of emission for each source, where available. For instance, the emissions from EU02, the brownstock system vent, is a total of the methanol, acetone, and chloroform emissions. Where speciated values were not available, such as the natural gas burning sources, the VOC values are from unspciated emission factors.
- 
- Paper Machine Acetone Emission Estimates. In the baseline PSEL usage of paper machine chemicals is shown to result in acetone emissions. In the proposed PSEL, the paper machines each have their own acetone emissions estimates, based on literature emission factors. The paper machine chemicals have been taken out of the acetone category, because a number of non-acetone VOC compounds are now used. The calculated amount of VOCs from paper machine chemicals is now shown, unspciated, in the VOC PSEL.
- 
- The unlabeled line of data on the baseline VOC form, ED-603, should have been labeled "Pulp Dryers". It accounts for VOC losses from the pulp being dried onsite, based on NCASI emission factors.
- 
- Wood Chip Pile VOC emissions. The calculations for these are found on page 78 of section EU 500, on form EU505A for emission unit EU48. The VOC emissions were separated out for this emission unit due to its size.
- 
- Gas Heat Content. We will take as our natural gas heat content the default value used for all natural gas burners in the state, 1050 BTU/cu.ft. This will affect the emissions for our units which have emission factors based on gas usage, and usage values given in therms.
- 
- Black Liquor Storage VOC Emissions: The emission factor in the baseline emission category is listed as 0.1 lb/ADTP. This was rounded up from a value of 0.04 lb/ADTP, which is the value used for the current PSEL calculation. The smaller value should be used in the baseline calculation, yielding a daily emission of 36.7 lb/day, and 6.2 ton/yr.

- 
- Bleach Plant VOC. The major change in bleach plant VOC emissions stems from the reduction in chloroform emissions. Major bleach plant modifications in 1992 reduced the formation of this compound, and thereby reduced to overall VOC emissions from the bleach plant.
- 
- Kraft Mill Acetone and Methanol Estimates: These have changed slightly from the baseline estimates. The earlier numbers lumped all kraft mill processes into one estimated emission factor. The newer estimate uses stack test information that is divided up into the emission units that comprise the kraft mill. The switch in estimation techniques has yielded a different number, which better reflects actual emission levels.
- 
- Waste Water Treatment Plant Estimates : These emissions were originally estimated from literature values. They were modified on the last permit reapplication-based on a new set of tests and modeling performed by James River.
- 
- A modified page for the mill description and modified PSEL sheets are attached to add the estimated emissions from the low pressure oxygen delignification stage now being incorporated into the bleach plant process. There is an increase in methanol and acetone emission estimated, based on values found in the attached literature references.

If you have any questions, please contact me at (503) 455-3233.

Sincerely,



Thor Sorenson

cc: Tim Baker  
File E510.1.1



**JAMES RIVER CORPORATION**

WAUNA MILL

Clatskanie, Oregon 97016 (503) 455-2221

November 14, 1994

Oregon Department of Environmental Quality  
Air Quality Division  
811 S.W. Sixth Avenue  
Portland, OR 97204-1390

Dear Ladies and Gentlemen:

Please find enclosed a completed Title V Federal Operating Permit Application for the James River Wauna Mill.

During the past eight years, the Wauna Mill has made significant progress in reducing air pollution. Major accomplishments include the following:

Converted Recovery Boiler to Indirect Contact	1986
Eliminated Black Liquor Oxidation	1986
Replaced Recovery Boiler Precipitator with a High Efficiency 4-Field Unit	1986
Built a White Liquor Scrubber to Treat Bleach Plant Tower and Seal Tank Vents	1990
Eliminated Sodium Hypochlorite Bleaching in the Kraft Bleach Plant	1992
Eliminated the Use of Chlorine Gas for Pulp Bleaching	1993
Captured Pulp Digester Feeder Vents for Incineration	1993 - 1994

In 1996 we will start up a Fluid Bed Boiler and Cogeneration facility. The new equipment will burn solid waste to generate steam and electric power. Operation

**RECEIVED**  
NOV 15 1994

AIR QUALITY DIVISION  
Dept. Environmental Quality



of the new facility, which includes sophisticated pollution control equipment, is included in the Title V Permit Application mill operating scenario.

Wauna is currently operating under Air Contaminant Discharge Permit (ACDP) #04-0004. The ACDP primarily focuses on regulating emissions from major process point sources like boilers and lime kilns. The Title V Permit Application includes a number of sources which are outside the scope of the ACDP. In this Application, the 1978 Baseline Plant Site Emission Rates are recalculated to include emissions from sources not covered by the ACDP. The Application also uses several new emission factors derived from an improved emission factor data base. James River is requesting facility-wide Plant Site Emission Limits (PSELs). Detailed calculations are shown in the Application. Our requested annual average PSELs are as follows:


	1978 Baseline Emission Rate, adjusted to include expanded source list and improved emission factors	Facility-wide PSEL Requested in Title V Permit Application
Particulate	1665.8 t/yr	1483.3 t/yr
TRS	57.9	62.9
Sulfur Dioxide	1879.5	1256.2
VOC	735.8	464.2
Carbon Monoxide	1865.2	1950.1
NOx	1614.4	1637.2
Chlorine	117.0	0.95
Chlorine Dioxide	157.9	32.8
Chloroform	151.0	16.4
Methanol	169.0	90.8
Acetone	36.3	31.2



The Wauna Mill is a complex production facility. Consequently, the attached Application is also complex. I anticipate that your staff will have questions about the details in the Application. Those questions should be directed to Thor Sorenson at (503) 455-3233.

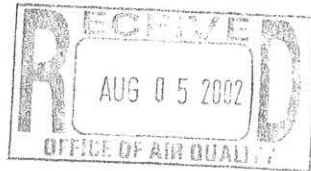
My staff is looking forward to working with the Department to develop a workable Title V permit. We all want a permit which protects the environment and which can be administered by the mill in a practical way. Please let us know how we can be of assistance.

Very truly yours,

A handwritten signature in cursive script, reading "Charles A. Warren".

Charles A. Warren  
Vice President, Resident Manager

Fort James  
July 26, 2002



  
**FORT JAMES**

File:  
— Enfl/compliance  
— TV Application  
— TV Activity  
— Other

Fort James Corporation  
Wauna Mill  
Clatskanie, OR 97016

telephone 503 455 2221

Mr. George Davis, Environmental Engineer  
Department of Environmental Quality  
Air Quality Division  
Northwest Region  
2020 S.W. 4<sup>th</sup> Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2002 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT  
(January 1 through June 30)**

Dear Mr. Davis:

Please, find enclosed two copies of the 2002 first semi-annual compliance certification for the Fort James Operating Company's Wauna Mill. We are submitting this report as required by our Air Operating Permit No. 04-0004, condition 160.

If you have any questions, please call me at (503) 455-3233.

Sincerely,

Mike Crawford  
Environmental Engineer

Encl.

cc: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E-510.4.6

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MAR 19 2001  
OFFICE OF AIR

FORT JAMES



March 14, 2001

Mr. George F. Davis, P.E.  
Sr. Environmental Engineer  
Oregon Dept. of Env. Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Fort James Corporation  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016

☐ Eff/compliance  
☐ TV Application  
☒ TV Activity  
☐ Other

**RE: 2000 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Fort James Wauna Mill. We are submitting this report prior to March 15, 2001, as required in the Air Operating Permit 04-0004, condition 161.

The report consists of the following sections, as required by condition 162:

Annual records of production	Annual records of raw material usage
Annual records of the amount of fuel used	Annual records of raw material consumed
Hours of Operation	Excess emissions upset log
Second semi-annual compliance certification covering the period July 1 through December 31, 2000.	

If you have any questions, please call or e-mail me at (503) 455 - 3233 or [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

Mike Crawford  
Environmental Engineer

Encl.

Cc: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E - 510.4.6

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# 932



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue  
Seattle, WA 98101

JUN 12 2002

Reply To  
Attn Of: OAQ-107

Mr. Johnny D. Baumgartner  
Permit Coordinator, Air Quality Program  
Northwest Region, OR Dept. of Environmental Quality  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Re: Proposed Operating Permit Number # 04-0041 for Fort James Operating Co.

Dear Mr. Baumgartner:

Thank you for the opportunity to review the above mentioned proposed Title V permit.

In accordance with ODEQ regulations and Section 505(b)(1) of the Clean Air Act, 42 U.S.C. §7661d(b)(1), and the implementing regulations at 40 C.F.R. §70.8(c), the Environmental Protection Agency (EPA) has 45 days from receipt of the proposed permit and all necessary supporting documentation to object in writing to its issuance. We are writing to notify you that EPA will not be reviewing the proposed permit action and will not object to its issuance. The permit is now eligible for issuance.

EPA's determination not to object to this permit in no way affects the public's right to petition the Administrator, pursuant to Section 505(b)(2) of the Clean Air Act, 42 U.S.C. §7661d(b)(2), and implementing regulations at 40 C.F.R. §70.8(d), to object to this permit. The time for filing such a petition shall remain open for 60 days after the end of the 45-day period, which commenced on June 4, 2002.

Further, the terms contained in the above referenced permit are specific to this facility and do not create conditions for the use, operation, or reliance of any other party. Please note that if the permit is later found to require corrective steps (including, but not limited to, reopening the permit for cause), the expiration of both EPA's review period and the public petition period without EPA objection does not compromise the Agency's authority to take such measures.

If you have any questions or concerns regarding this letter or would like to discuss these matters further, please contact me at (206) 553-6641.

Sincerely,

Jeff KenKnight, Manager  
Federal & Delegated Air Program Unit  
Office of Air Quality





**FORT JAMES**

March 13, 2006

Mr. George F. Davis, P.E.  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

*Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016*

**Received**

**MAR 16 2006**

**RE: 2005 ANNUAL AIR MONITORING REPORT**

Office Of Air, Waste  
And Toxics

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Fort James Wauna Mill. We are submitting this report prior to March 15, 2004, as required in the Air Operating Permit 04-0004, condition 167.

The report consists of the following sections, as required by condition 168:

Annual records of production	Annual records of the amount of fuel used
Hours of Operation	Excess emissions upset log
Second semi-annual compliance certification covering the period July 1 through December 31, 2004.	

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Kelly L. Wolff  
Vice President / Mill Manager

JOSEPH C. GIBLIN  
ACTING MILL MANAGER

Encl.

c: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprtng Req 80

March 13, 2005

Received  
MAR 16 2006  
Office Of Air, Waste  
And Toxics

  
**FORT JAMES**

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; July 1 through December 31, 2005.

All excess emissions from the bleaching system, hard pipe treatment system, backup thermal oxidizer and noncondensable gas venting were less than the one percent allowable for the six-month period, excluding the startup, shutdowns, and malfunctions.

During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, backup thermal oxidizer and noncondensable gas venting were less than the five percent allowable, excluding the startup, shutdowns, and malfunctions.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,



Kelly L. Wolff  
Vice President / Mill Manager

JOSEPH C. ENTENACCI  
ACTING MILL MANAGER

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20

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FEB 27 2006

Office Of The Executive

Enf Source ☒  
NSPS 60/62 ☐  
NESHAP ☐  
MACT ☐  
Other ☐

FORT JAMES

Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016

February 21, 2006

**Certified Mail / Return Receipt Requested #7000 0600 0027 3366 0400**

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Division  
2020 SW 4<sup>th</sup>, Suite 400  
Portland, OR 97201-5884

**Certified Mail / Return Receipt Requested #7000 0600 0027 3359 1195**

Mr. Ronald Kreizenbeck  
Environmental Protection Agency  
1200 Sixth Avenue  
Seattle, WA 98101

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MAR 03 2006

**RE: NOTICE OF INTENT TO CONDUCT PERFORMANCE TEST**

Office of Air, Waste & Toxics

Gentlemen:

On November 10, 2005 Fort James Operating Company's Wauna Mill submitted a Site Specific Fuel Sampling and Analysis Plan (the Plan) as required by section 63.7521 of 40 CFR Part 63 Subpart DDDDD, or the Boiler MACT. As required by 40 CFR 63.7545(d), the Wauna Mill is now submitting a Notice of Intent to conduct a performance test using the procedures as outlined in the Plan.

The Wauna Mill will collect the first composite sample (or run) of the performance test which is described more fully in the Plan and will be conducted over approximately the next 19 to 21 months. On March 22, 2006 these runs will be conducted approximately monthly for sludge and hog fuel. If requested by the Oregon DEQ, the Wauna Mill will notify you of the date for each of the following run(s) as they are scheduled.

If you have any questions, please contact Mike Crawford of my staff at (503) 455-3233.

Sincerely,

  
Kelly L. Wolff  
Vice President / Mill Manager

File: Boiler MACT

Received

NOV 03 2006

Office Of Air, Waste  
And Toxics

  
**FORT JAMES**

October 24, 2006

*Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016*

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2006 3rd QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2006 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 164 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

*Frank Wash for JRS*

James R. Jordan  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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Received  
FEB 13 2006

Office Of Air, Waste  
And Toxics

FORT JAMES



February 1, 2006

Fort James Operating Company  
Waukena Mill  
92326 Taylorville Road  
Clatskanie, OR 97016

Mr. George Davis, Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: LIME KILN, RECOVERY FURNACE, and SMELT DISSOLVING TANK  
TEST REPORTS**

Dear Mr. Davis:

Enclosed please find two copies of the Lime Kiln, Recovery Furnace, and Smelt Dissolving Tank test reports. These tests were performed utilizing the methods specified in our test plan submitted earlier.

The following table is a summary of the test results:

<u>SOURCE</u>	<u>PARAMETER</u>	<u>RESULTS</u>	<u>COMPLIANCE LIMIT</u>
Lime Kiln (EU-21) [fuel oil]	TSP	0.0356 gr/dscf @ 10% O <sub>2</sub>	0.064 gr/dscf @ 10% O <sub>2</sub>
	TSP	0.0356 gr/dscf @ 10% O <sub>2</sub>	0.20 gr/dscf @ 10% O <sub>2</sub>
	TSP	0.18 lb/adut	1.0 lb/adut
Rec. Furn. (EU-24)	TSP (East Stack)	0.053 gr/dscf @ 8% O <sub>2</sub>	0.044 gr/dscf @ 8% O <sub>2</sub>
	TSP (West Stack )	0.013 gr/dscf @ 8% O <sub>2</sub>	0.044 gr/dscf @ 8% O <sub>2</sub>
	TSP (Both Stacks)	1.20 lb/adut	4.0 lb/adut
	TRS	1.1 ppm @ 8% O <sub>2</sub>	5 ppm @ 8% O <sub>2</sub>
Smelt Tank (EU-25)	TSP	0.127 lb/adut	0.50 lb/adut
	TRS	0.011 lb/ton BLS	0.033 lb/ton BLS

**NOTE:** gr/dscf @ 10% O<sub>2</sub> = pound per dry standard cubic foot corrected to ten percent oxygen  
lb/adut = pound per air dried unbleached pulp ton  
gr/dscf @ 8% O<sub>2</sub> = pound per dry standard cubic foot corrected to eight percent oxygen  
lb/ton bls = pound per ton of black liquor solids

The test results confirm the lime kiln and smelt dissolving tank are in compliance with the applicable limits. However, the recovery furnace east stack was not in compliance with the applicable particulate concentration limit. We are in the process of investigating the root cause of this exceedance. In the meantime, we will perform additional testing at various rates to obtain data to assist in our troubleshooting process. We will be contacting an electrostatic precipitator expert to assist us in our troubleshooting process.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions or comments, please feel free to call or e-mail Mike Crawford at (503) 455 – 3233 or [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

A handwritten signature in cursive script, appearing to read "Kelly L. Wolff".

Kelly L. Wolff  
Vice President / Mill Manager

Enclosures (2)

c: Mike Crawford - Technical

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FORT JAMES

March 13, 2006

Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

Received

MAR 16 2006

Office Of Air, Waste  
And Toxics

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; July 1 through December 31, 2005.

All excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent allowable for the six-month period, excluding the startups, shutdowns, and malfunctions. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent allowable, excluding the startups, shutdowns, and malfunctions.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,



Kelly L. Wolff  
Vice President / Mill Manager

ACTIVE MILL MANAGER  
JOSEPH C. GUTWALD

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Avenue  
Seattle, WA 98101



**FORT JAMES**

July 28, 2006

*Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016*

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 2006 2nd QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2006 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 164 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455- 3233.

Sincerely,

  
James R. Jordan  
Vice President / Mill Manager

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101

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Received  
AUG 03 2006  
Office Of Air, Waste  
And Toxics





**FORT JAMES**

July 28, 2006

*Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016*

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**Re: MACT II Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions Summary and Monitoring System Summary Report* for the time period; January 1 through June 30, 2006.

All excess emissions from the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the one percent allowable for the six-month period. During the time period, the continuous monitoring systems downtime for the chemical recovery furnace, smelt dissolving tank, and lime kiln were less than the five percent allowable.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter, please do not hesitate to contact Mike Crawford, of my staff, at (503) 405 - 3233.

Sincerely,

  
James R. Jordan  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Avenue  
Seattle, WA 98101



**FORT JAMES**

July 28, 2006

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

*Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016*

**Re: Cluster Rule Excess Emissions and Monitoring Summary Report**

Dear Mr. Davis:

Attached is the Wauna Mill's *Excess Emissions and Monitoring System Summary Report* for time period; January 1 through June 30, 2006, with the exception of the High Volume Low Concentration System for which the time period is April 17 through June 30, 2006.

All excess emissions from the bleaching system, hard pipe treatment system, backup thermal oxidizer, noncondensable gas venting and high volume low concentration venting were less than the one percent allowable for the six-month period.

During the reporting period, the continuous monitoring systems downtime for the bleaching system, hard pipe collection and treatment system, backup thermal oxidizer, noncondensable gas, and high volume low concentration were less than the five percent allowable.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning the information provided in this letter and attachments, please do not hesitate to call Mike Crawford at (503) 405 - 3233.

Sincerely,



James R. Jordan  
Vice President / Mill Manager

c: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Avenue  
Seattle, WA 98101

File: RR SubA&S Semi - 20



**JAMES RIVER CORPORATION**

WAUNA MILL

Clatskanie, Oregon 97016

(503) 455-2221

*Airletter sent EEO form to  
George Davis 2/3/97*

January 30, 1997

*(503) 229-5534*

Mr. George Davis  
Oregon Department Of Environmental Quality  
Northwest Regional Operations  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

FEB 03 1997

OFFICE OF AIR

Dear Mr. Davis:

Enclosed please find the quarterly performance report for the Fluidized Bed Boiler, emissions unit EU-35, for the fourth quarter 1996, as required by air permit condition 151.

Reporting begins Nov. 21, 1996. This was the official day of startup, following the successful compliance test performed Nov. 20, 1996.

The most notable feature of the report is the high number of days in which a portion of the monitoring data was excluded from the averages. As we have discussed, the control program of the CEMS has taken some time to modify and upgrade to the point of working reliably. We believe future reports will contain a much higher proportion of included data.

The report is arranged in reference to air permit condition 151, with some rearrangement to present similar data in the same section. Subsection numbers are referenced on the section cover pages.

If you have any questions, please call me at (503) 455-3233.

Sincerely,

Thor Sorenson  
Environmental Engineer

cc: T. J. Baker, w/o enclosures  
D.A. Radonski, w/ Encl.  
K. R. Coats  
File E510.4.5

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Ave  
Seattle, WA 98101

October 31, 1997

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Fort James Corporation  
Wauna Mill  
Clatskanie, OR 97016  
telephone 503 455 2221

**RE: FLUID BED BOILER 1997 3<sup>rd</sup> QUARTER AIR REPORT**

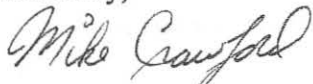
Dear Mr. Davis:

Enclosed with this letter is the 1997 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 151 in our Title V Operating Permit No. 04-0004.

The report is arranged in reference to permit condition 151, with some rearrangement to present similar data in the same section. Subsection numbers are referenced on the section cover pages.

If you have any questions, please call me at (503) 455 - 3233.

Sincerely,



Mike Crawford  
Environmental Engineer

Encl.

cc: T. J. Baker -- Tech. (e-mail letter only)  
D. A. Radonski -- Tech. (e-mail letter only)  
T. A. Barr -- Tech. (e-mail letter only)  
File E-510.4.5

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Ave.  
Seattle, WA 98101





**JAMES RIVER CORPORATION**

WAUNA MILL

Clatskanie, Oregon 97016 (503) 455-2221

July 22, 1997

AUG 4 1997

OFFICE OF AIR

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 1997 2<sup>nd</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 1997 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 151 in our Title V Operating Permit No. 04-0004.

The report is arranged in reference to permit condition 151, with some rearrangement to present similar data in the same section. Subsection numbers are referenced on the section cover pages.

If you have any questions, please call me at (503) 455 - 3233.

Sincerely,

Mike Crawford  
Environmental Engineer

Encl.

cc: T. J. Baker -- Tech. (e-mail letter only)  
D. A. Radonski -- Tech. (e-mail letter only)  
T. A. Barr -- Tech. (e-mail letter only)  
File E-510.4.5

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Ave.  
Seattle, WA 98101



**JAMES RIVER CORPORATION**

WAUNA MILL

Clatskanie, Oregon 97016 (503) 455 2221

MAY 5 1997

OFFICE OF AIR

May 1, 1997

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 1997 1<sup>st</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

The letter dated April 28, 1997, submitted to you containing the Fluid Bed Boiler Quarterly Air Report is for the First Quarter of 1997, not the Second Quarter as stated in the letter.

Please discard the April 28<sup>th</sup> letter and replace with this letter.

Enclosed with this letter is the 1997 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 151 in our Title V Operating Permit No. 04-0004.

The report is arranged in reference to permit condition 151, with some rearrangement to present similar data in the same section. Subsection numbers are referenced on the section cover pages.

Sorry for the inconvenience this has caused you. If you have any questions, please call me at (503) 455 - 3233. I look forward to meeting on Monday, May 5<sup>th</sup>.

Sincerely,

Mike Crawford  
Environmental Engineer

cc: T.J. Baker  
D.A. Radonski  
File E - 510.4.5

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Ave.  
Seattle, WA 98101

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**ENTERED**  
**MAY 15 1997**  
**PCCEMS/AIRS**

Kral



File:  
\_\_\_\_ Enf/compliance  
\_\_\_\_ TV Application  
\_\_\_\_ ☒ TV Activity  
\_\_\_\_ Other  
\_\_\_\_

**FORT JAMES** OFFICE OF AIR

January 29, 1998

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Fort James Corporation  
Wauna Mill  
Clatskanie, OR 97016  
  
telephone 503 455 2221

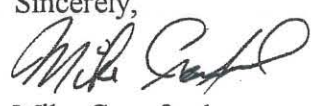
**RE: FLUID BED BOILER 1997 4<sup>th</sup> QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 1997 Fourth Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 151 in our Title V Operating Permit No. 04-0004.

The report is arranged in reference to permit condition 151, with some rearrangement to present similar data in the same section. Subsection numbers are referenced on the section cover pages.

If you have any questions, please call me at (503) 455 - 3233.

Sincerely,  
  
Mike Crawford  
Environmental Engineer

Encl.

- cc: T. J. Baker -- Tech. (e-mail letter only)  
D. A. Radonski -- Tech. (e-mail letter only)  
T. A. Barr -- Tech. (e-mail letter only)  
File E-510.4.5

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Ave.  
Seattle, WA 98101

NOV 3 1998

OFFICE OF AIR

FORT JAMES



File: ☒ Env/Compliance  
☐ TV Application  
☐ TV Activity  
☐ Other  
Fort James Corporation  
Wanna Mill  
Clatskanie, OR 97016  
Telephone: (503) 455-2221

October 29, 1998

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: FLUID BED BOILER 1998 3rd QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 1998 Third Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 151 in our Title V Operating Permit No. 04-0004.

The report is arranged in reference to permit condition 151, with some rearrangement to present similar data in the same section. Subsection numbers are referenced on the section cover pages.

If you have any questions, please call me at (503) 455 - 3233.

Sincerely,

Mike Crawford  
Environmental Engineer

Encl.

File E-510.4.5

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Ave.  
Seattle, WA 98101





**FORT JAMES**

July 30, 1998

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

*Fort James Corporation*

*Wauna Mill*

*Clatskanie, OR 97016*

*telephone 503 455 2221*

**RE: FLUID BED BOILER 1998 2nd QUARTER AIR REPORT**

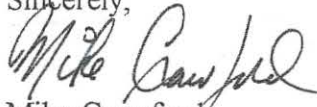
Dear Mr. Davis:

Enclosed with this letter is the 1998 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 151 in our Title V Operating Permit No. 04-0004.

The report is arranged in reference to permit condition 151, with some rearrangement to present similar data in the same section. Subsection numbers are referenced on the section cover pages.

If you have any questions, please call me at (503) 455 - 3233.

Sincerely,



Mike Crawford  
Environmental Engineer

Encl.

File E-510.4.5

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Ave.  
Seattle, WA 98101

MAY - 5 1998

OFFICE OF AIR

FORT JAMES



U.S. EPA Region 10

April 30, 1998

MAY 04 1998

OFFICE OF WATER

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Fort James Corporation  
Wauna Mill  
Clatskanie, OR 97016

telephone 503 455 2221

**RE: FLUID BED BOILER 1998 1st QUARTER AIR REPORT**

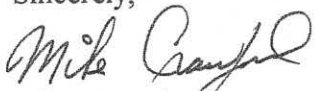
Dear Mr. Davis:

Enclosed with this letter is the 1998 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 151 in our Title V Operating Permit No. 04-0004.

The report is arranged in reference to permit condition 151, with some rearrangement to present similar data in the same section. Subsection numbers are referenced on the section cover pages.

If you have any questions, please call me at (503) 455 - 3233.

Sincerely,

  
Mike Crawford  
Environmental Engineer

Encl.

File E-510.4.5

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Ave.  
Seattle, WA 98101



**FORT JAMES**

July 28, 2006

*Fort James Operating Company  
Wauna Mill  
92326 Taylorsville Road  
Clatskanie, OR 97016*

Mr. George F. Davis.  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2006 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT  
(January 1 through June 30, 2006)**

Dear Mr. Davis:

Please, find enclosed two copies of the 2006 first semi-annual compliance certification report for the Fort James Operating Company's Wauna Mill. We are submitting this report prior to July 30, 2006 as required in the Air Operating Permit 04-0004, condition 166.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

  
James R. Jordan  
Vice President / Mill Manager

Encl.

cc: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E – Rprtnq Req 70

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Received  
AUG 02 2006  
Office Of Air, Waste  
And Toxics



**FORT JAMES**

**RECEIVED**

**MAR 20 2006**

Office of Air, Waste & Toxics

*Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016*

March 16, 2006

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for February 13-15, 2006, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please call me at (503) 455 - 3667.

Sincerely,

Thor Sorenson  
Senior Process Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450





March 13, 2007

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2006 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. We are submitting this report prior to March 15, 2004, as required in the Air Operating Permit 04-0004, condition 155.

The report consists of the following sections, as required by condition 156:

Annual records of production  
Hours of Operation  
Emission Fee calculations

Annual records of the amount of fuel used  
Excess emissions upset log

Second semi-annual compliance certification covering the period July 1 through December 31, 2006.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

*Frank Walsh for JRJ*

James R. Jordan  
Vice President / Mill Manager

**Received**

**MAR 21 2007**

**Office Of Air, Waste  
And Toxics**

Encl.

c: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprtnq Req 80

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**FORT JAMES**

*Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016*

December 29, 2006

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

*Received  
JAN 13 2007  
Office of Air Quality  
and Toxics*

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for November 13-16, 2006, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please call me at (503) 455 - 3667.

Sincerely,

Thor Sorenson  
Senior Process Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450

**FORT JAMES**



*Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016*

June 8, 2006

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for May 3-5, 2006, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please call me at (503) 455 - 3667.

Sincerely,

Thor Sorenson  
Senior Process Engineer

**Received**  
**JUN 12 2006**  
**Office Of Air, Waste  
And Toxics**

cc. US EPA, Air Operating Permits  
File - PCR-BT 450



**Georgia-Pacific**

**Received**

**DEC 19 2007**

**Office Of Air, Waste  
And Toxics**

*Georgia-Pacific Consumer Products LP*

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

December 14, 2007

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Condensate Emission Factor Verification Testing**

Dear Mr. Davis:

Enclosed with this letter is the **Condensate Emission Factor Verification Study**, as required by condition 34 of Part II of the Title V Operating Permit No. 04-0004

As discussed on our December 13<sup>th</sup>, 2007 phone conversation, the report submission date of December 14<sup>th</sup> is 53 days after the mill received the sampling data from Columbia Analytical.

If you have any questions, please call me at (503) 455 - 3236.

Sincerely,

Jeff Sorensen  
Environmental Engineer

Encl.





Georgia-Pacific Consumer Products LP

Received

MAR 17 2008

Office Of Air, Waste  
And Toxics

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 13, 2008

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2007 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. We are submitting this report prior to March 15, 2008, as required in the Air Operating Permit 04-0004, condition 155.

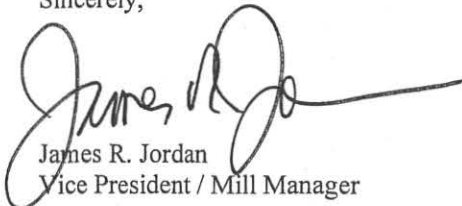
The report consists of the following sections, as required by condition 156:

Annual records of production	Annual records of the amount of fuel used
Hours of Operation	Excess emissions upset log
Emission Fee calculations	
Second semi-annual compliance certification covering the period July 1 through December 31, 2007.	

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,



James R. Jordan  
Vice President / Mill Manager

Encl.

c: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprting Req 80

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**Georgia-Pacific**

*Georgia-Pacific Consumer Products LP*

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

**Received**  
**DEC 14 2007**  
**Office Of Air, Waste**  
**And Toxics**

December 11, 2007

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for November 5-9, 2007, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. A mill shutdown on November 7<sup>th</sup> interfered with the three consecutive days of testing required for the quarterly test. As you approved during our November 7<sup>th</sup> phone conversation, the third day of sampling was conducted on November 9<sup>th</sup> following start-up of the mill. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please call me at (503) 455-3236.

Sincerely,

Jeff Sorensen  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450



**Georgia-Pacific**

**Received**  
**SEP 04 2007**  
**Office Of Air, Waste**  
**And Toxics**

*Georgia-Pacific Consumer Products LP*

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

August 29, 2007

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for August 8-10, 2007, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please call me at (503) 455-3236.

Sincerely,

Jeff Sorensen  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

June 29, 2007

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received  
JUL 02 2007  
Office Of Air, Waste  
And Toxics

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for April 23-25, 2007, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please call me at (503) 455-3236.

Sincerely,

A handwritten signature in black ink, appearing to be 'JS', followed by a long horizontal line.

Jeff Sorensen  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450





**Georgia-Pacific**

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

May 15, 2009

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

**Received**  
**MAY 26 2009**  
**Office Of Air, Waste  
And Toxics**

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for April 22-24, 2009, as required by condition 38 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File – PCR-BT 450



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

April 27, 2007

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received  
MAY 07 2007  
Office Of Air, Waste  
And Toxics

**RE: FLUID BED BOILER 2007 1st QUARTER AIR REPORT**

Dear Mr. Davis:

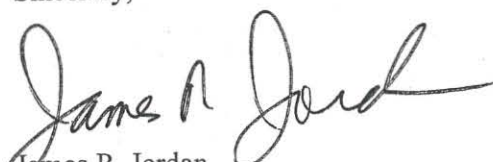
Enclosed with this letter is the 2007 First Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 152 in our Title V Operating Permit No. 04-0004.

There were no nitrogen oxide emission exceedences during the quarter. The quarterly cylinder gas audit is enclosed for your reference, which passed the audit.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

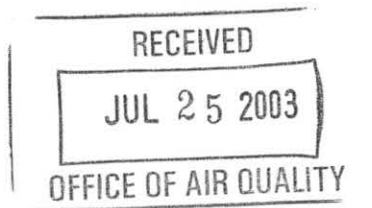
Sincerely,

  
James R. Jordan  
Vice President / Mill Manager

Encl.

File: Rprtnq Req 50

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Ave.  
Seattle, WA 98101



July 21, 2003

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

*Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016*

**RE: FLUID BED BOILER 2003 2nd QUARTER AIR REPORT**

Dear Mr. Davis:

Enclosed with this letter is the 2003 Second Quarter air report for the Fluid Bed Boiler, emissions unit EU-35, as required by condition 164 in our Title V Operating Permit No. 04-0004. In addition the Relative Accuracy Test Audit Report is enclosed.

There were no nitrogen oxide emission exceedences during the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

Should you have any questions, please call Mike Crawford of my staff at (503) 455 - 3233.

Sincerely,

A handwritten signature in cursive script, appearing to read "R P Wenger".

Richard P. Wenger  
Vice President / Mill Manager

Encl.

File: E-510.4.5  
cc: M. Crawford - Tech.

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Ave.  
Seattle, WA 98101



**Georgia-Pacific**

File Title S  
Enf/comp \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 28, 2010

Mr. George F. Davis.  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**Received**  
**AUG - 2 2010**  
**Office Of Air, Waste  
And Toxics**

**RE: 2010 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT  
(January 1 through June 30, 2010)**

Dear Mr. Davis:

Please, find enclosed two copies of the 2010 first semi-annual compliance certification report for the Georgia-Pacific Consumer Products LP Wauna Mill. We are submitting this report prior to July 30, 2010 as required in the Air Operating Permit 04-0004, condition 154.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,

*Michael D. Tompkins*

Michael D. Tompkins  
Vice President / Mill Manager

Enclosure

c: DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E – Rprtnq Req 70





**Georgia-Pacific**

File Title 5  
Enf/comp \_\_\_\_\_  
NSPS/Subpt \_\_\_\_\_  
MACT Subpt \_\_\_\_\_  
Other \_\_\_\_\_

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

July 30, 2010

Mr. George Davis  
Oregon Department of Environmental Quality  
Northwest Regional Operation  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

Received  
AUG - 2 2010  
Office Of Air, Waste  
And Toxics

**RE: Quarterly Condensate Biological Treatment Performance Test**

Dear Mr. Davis:

Enclosed with this letter is the **Quarterly Condensate Biological Treatment Performance Test** for July 6-8, 2010, as required by condition 36 of Part 2 of our Title V Operating Permit No. 04-0004. The test successfully demonstrated compliance with the permit's HAPs destruction requirements.

If you have any questions, please contact me at (503) 455-3370.

Sincerely,

Al Deichsel  
Environmental Engineer

cc. US EPA, Air Operating Permits  
File - PCR-BT 450



Received  
MAR 12 2010  
Office Of Air, Waste  
And Toxics

Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 10, 2010

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2009 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. We are submitting this report prior to March 15, 2010, as required in the Air Operating Permit 04-0004, condition 155.

The report consists of the following sections, as required by condition 156:

Annual records of production	Annual records of the amount of fuel used
Hours of Operation	Excess emissions upset log
Emission Fee calculations	Green House Gas Emissions
Second semi-annual compliance certification covering the period July 1 through December 31, 2009.	

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Michael D. Tompkins  
Vice President / Mill Manager

Encl.

c: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprtnq Req 80



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016  
(503) 455-2221  
(503) 455-3562 fax

March 13, 2009

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

Received

MAR 20 2009

Office Of Air, Waste  
And Toxics

**RE: 2008 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Georgia-Pacific Consumer Products LP, Wauna Mill. We are submitting this report prior to March 15, 2009, as required in the Air Operating Permit 04-0004, condition 155.

The report consists of the following sections, as required by condition 156:

Annual records of production	Annual records of the amount of fuel used
Hours of Operation	Excess emissions upset log
Emission Fee calculations	
Second semi-annual compliance certification covering the period July 1 through December 31, 2008.	

As a conservative measure, we are certifying to "intermittent" (as opposed to "continuous") compliance for a small number of permit conditions where the mill arguably deviated in some way from the technical/literal requirements in a particular permit condition while remaining in compliance with permit and regulatory requirements. One example of this is those permit conditions requiring that NCG gases be collected and treated under the Cluster Rule; while there were a number of NCG venting events during the reporting period in which NCG gases were vented, which we have reported to DEQ in various periodic reports, we remained in compliance with the permit and underlying regulatory requirements because these "deviations" were caused by SSM or other excusable conditions or were within specific regulatory allowances for excess emissions (e.g., the 1%/4% excess emissions allowances under 40 CFR Part 63, Subpart S). Other examples include monitoring conditions where we may have had monitor downtime or monitoring data outside established ranges for small periods of time, but all such downtime or parameter excursions were within permit and regulatory allowances. By certifying to "intermittent" compliance for such conditions, we are not admitting or certifying to noncompliance; rather, we are just acknowledging that there were

4100700004

Received

AUG 02 2005

Office Of Air, Waste  
And Toxics

FORT JAMES



July 20, 2005

Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016

Mr. George F. Davis, P.E.  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2005 FIRST SEMI-ANNUAL COMPLIANCE CERTIFICATION REPORT  
(January 1 through June 30, 2005)**

Dear Mr. Davis:

Please, find enclosed two copies of the 2005 first semi-annual compliance certification report for the Fort James Operating Company's Wauna Mill. We are submitting this report prior to July 30, 2005 as required in the Air Operating Permit 04-0004, condition 166.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233 or e-mail [mike.crawford@gapac.com](mailto:mike.crawford@gapac.com).

Sincerely,



KELLY L. WOLFF  
Vice President / Mill Manager

Kelly L. Wolff  
Vice President / Mill Manager

Encl.

cc: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: E - Rprtnq Req 70



Received

MAR 17 2005

FORT JAMES



Office Of Air, Waste  
And Toxics

March 14, 2005

Fort James Operating Company  
Wauna Mill  
92326 Taylorville Road  
Clatskanie, OR 97016

Mr. George F. Davis, P.E.  
Sr. Environmental Engineer  
Oregon Department of Environmental Quality  
Northwest Region  
Air Quality Program  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-5884

**RE: 2004 ANNUAL AIR MONITORING REPORT**

Dear Mr. Davis:

Enclosed please find two copies of the annual monitoring report for the Fort James Wauna Mill. We are submitting this report prior to March 15, 2004, as required in the Air Operating Permit 04-0004, condition 167.

The report consists of the following sections, as required by condition 168:

Annual records of production	Annual records of the amount of fuel used
Hours of Operation	Excess emissions upset log
Second semi-annual compliance certification covering the period July 1 through December 31, 2004.	

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Mike Crawford at (503) 455-3233.

Sincerely,

Kelly L. Wolff  
Vice President / Mill Manager

Encl.

c: DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(1 copy)

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101  
(1 copy)

File: Rprtng Req 80

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Enf / Compl  
T5 Activity  
Other



Georgia-Pacific Consumer Products LP

Wauna Mill  
92326 Taylorville Rd.  
Clatskanie, OR 97016  
(503) 298-2600  
(503) 455-3926 fax  
[www.gp.com](http://www.gp.com)

November 10, 2011

Mr. George F. Davis  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987

**RE: SUBPART MM 3rd QUARTER 2011 REPORT**

Dear Mr. Davis:

Attached to this letter is the Georgia-Pacific Consumer Papers LP; Wauna Mill's Subpart MM sources 2011 Third Quarter report as required per condition 6 of Part 2 in our Title V Operating Permit 04-0004.

The duration of excess emissions deviations from the chemical recovery furnace, smelt dissolving tank and lime kiln, was less than one percent as a percentage of total operating time for each source in the reporting period. In addition, monitoring downtime for the chemical recovery furnace, smelt dissolving tank and lime kiln was less than five percent as a percentage of total operating time for each monitoring system in the quarter.

Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.

If you have any questions concerning this information, please contact Jeff Sorensen at (503) 455-3236.

Sincerely,

Frank Walsh  
Interim Mill Manager

Attach.

cc: Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-084  
1200 Sixth Avenue  
Seattle, WA 98101

Received  
NOV 17 2011  
Office Of Air, Waste  
And Toxics



**JAMES RIVER CORPORATION**

WAUNA MILL

Clatskanie, Oregon 97016 (503) 455-2221

April 29, 1996

Oregon Department Of Environmental Quality  
Northwest Regional Operations  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201

MAY 02 1996

OFFICE OF AIR

DEQ - Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop AT-084  
1200 Sixth Avenue  
Seattle, WA 98101

Greetings:

As required in the Title V permit issued to James River Paper Co. Inc., Wauna Mill, on Jan. 2, 1996, we are providing a quarterly report of monitoring data from the operation of the fluidized bed boiler.

The boiler was not operated in the first quarter of 1996, and therefore no monitoring data was collected for this time period.

If you have any questions, please call me at (503) 455-3233.

Sincerely,

Thor Sorenson  
Environmental Engineer

cc: T. J. Baker - Technical  
Don Flach - Util  
Dan Radonski -- Technical